

Paulton Parish Council Representation to B&NES Draft Local Plan Reg. 19 Consultation

Paulton Parish Council (PPC) represents ~6,500 villagers and is submitting this response on their behalf. PPC has gathered views on new housing in the village via a survey that ran during August and September 2026 for their developing Neighbourhood Plan with responses from ~10% of households. A Local Plan meeting was held on the 9th of October, with standing room only left in the Village Hall, and villagers offered their views.

Paulton Parish Council believes that the B&NES Draft Local Plan is non-legally compliant and unsound in its current form. We state that:

- Homes should be located where the need is and where the jobs are i.e. in the principal settlement, Bath, to ensure sustainable transport connectivity
- A 'derelict, brownfield, planning permission first' approach should be taken, rather than building on agricultural land in rural, unsustainable locations
- The Paulton sites (Farrington Road North and South, Paulton South and Mendip Close) should be removed from the Local Plan as they are unsustainable and therefore incompatible with the NPPF.

1. Representation to Policy 1.1 & 1.2 - Unjustified housing requirement

The Government has set a target to build 1.5 million homes by 2030. This target has doubled the number of houses proposed for Bath and North East Somerset in the Local Plan to 27,000 by 2043 (B&NES, 2026a). Paulton Parish Council strongly asserts that is an inappropriate, unjustified, non-evidence led approach that fails to consider local need, particularly for a rural county like Bath and North East Somerset. Even with B&NES Council's revision to meet 80% of this target, building this many homes in such a short space of time will have a devastating social and environmental impact in B&NES, and in particular the poorly connected Somer Valley and Rural Areas. It also fails to consider the effects of climate change leading to drier, hotter summers, which were very apparent this year with the prolonged drought and water shortages. 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). Furthermore, particularly in rural areas such as the Somer Valley with limited services and amenities, these green spaces are vital for our health and wellbeing.

This developer-led new build target is all the more unjustified given that there are currently 1.5 million vacant, derelict or underused homes, 1 million homes with planning permission unbuilt and scope for 1.2-1.4 million homes on brownfield sites across the UK (CPA, 2025; CPRE, 2025). In B&NES, this amounts to ~5,000 homes with planning permission and ~2,300 vacant homes that could be brought into use (B&NES, 2025; B&NES 2026b), and these

should be initially prioritised rather than building new sites for housing. The Housing Supply Topic paper p.29 shows that this is not the case, 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. Farrington Road North and Chilcompton Road (B&NES, 2026c). Building these existing commitments and bringing the vacant homes into use would almost cover the entire affordable housing shortfall in B&NES, which is expected to be 8,300 households by 2043, 61% of which need is in Bath (B&NES, 2026b).

1.1 Representation to Policy 1.1 & 1.4 - Unjustified spatial strategy

Given that Bath is the principal settlement in B&NES, the centre for jobs, services and amenities, and its students are responsible for the population increase driving the demand for housing (B&NES, 2026d), it would correlate 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, 2026a, Chapter 1 - District Wide Strategy). The spatial strategy is therefore non-legally compliant and unsound, because it is not based on appropriate evidence, not justified and not consistent with the NPPF, since it limits housing in the area of greatest need with the most sustainable transport connections and disperses housing to far less sustainable car-dependent locations.

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, 2026e, Transport Topic Paper, p. 26, fig. 4.4), shown in Figure 1.

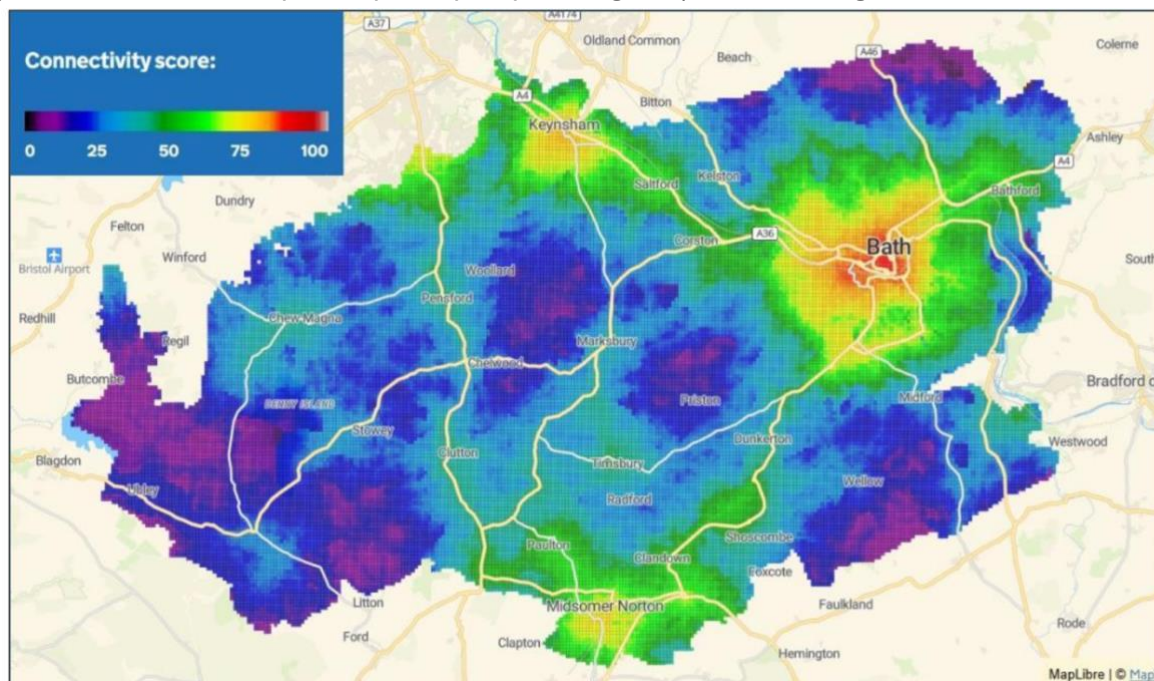


Figure 1 - Connectivity: all modes except driving (B&NES Transport Topic Paper, 2026e)

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.

Using this data, the formation of Settlement Tiers 1-4 (Table 1) is not justified as it is not based on the appropriate evidence. Looking at the underlying data (Table 2; Reynolds, 2026; DfT, 2026), Bath sites have an overall mean Connectivity score of 78+ putting them in the 90th percentile of connectivity, whereas sites on the outskirts of rural towns such as Midsomer Norton and Radstock, also allocated to Tier 1 – Principal Settlements, only score between 47-55, putting them in the bottom <10th percentile. All the Paulton sites score between 44-52 and are also in the bottom <10th percentile, yet Paulton is allocated to Tier 2 – Highly Sustainable Settlements. Some villages such as Hallatrow are classed as Tier 4 – Less Sustainable Settlements, and yet have housing allocations in this Local Plan. Planning for more housing in areas with poor connectivity that require car use is unsound because it is unjustified and is against the NPPF and B&NES’ plan to be zero carbon by 2030 to locate people near to the jobs and facilities they require in order to reduce the need to travel unsustainably. Furthermore, it appears B&NES has prioritised the heritage of Bath over the impacts of increased travel, pollution and climate change in the Somer Valley and Rural Areas without evidence or justification.

Table 1 – Current Settlement Tiers (B&NES, 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

Table 2 – 49 site DfT Connectivity Reassessment (Reynolds, 2026)

Sorted by peer-group position. "≥90" and "<10" are bounded tail categories because the published DfT Matrix provides decile thresholds; ordering within those tails uses the raw mean score and should not be read as an exact percentile ranking. RUC is the observed ONS rural-urban class of the sampled grid cells.

Original B&NES option-stage grades are shown where a defensible match to the Regulation 19 allocation could be made; otherwise the entry is "Unknown". An asterisk marks a successor allocation whose current boundary/capacity is not a one-to-one match to the earlier option. "Delta" is the change in A–J grade bands (positive = stronger/earlier peer-relative signal; negative = weaker/later). It is a grade-band movement, not a unique ordinal site-rank change. Where the earlier source contained two different grades for the current allocation (West Keynsham A/B), no delta is calculated.

Order	Policy	Site	Homes	RUC	Mean	Median	Range	Cells	Peer %ile	Peer grade	B&NES grade	Delta
1	2.1	Bath Quays North & Bath College	≥130	C1	85.0	85.0	84-86	5	≥90	A	Unknown	n/a
2	2.2	Green Park Station West & Sydenham Park	mixed	C1	83.5	84.0	82-84	8	≥90	A	Unknown	n/a
3	2.4	Stable Yard Industrial Estate	unquantified	C1	81.0	81.0	81-81	1	≥90	A	Unknown	n/a
4	2.5	Roseberry Place	unquantified	C1	81.0	81.0	81-81	1	≥90	A	Unknown	n/a
5	2.6	Lower Bristol Road Group of Sites	unquantified	C1	81.0	81.0	81-81	1	≥90	A	Unknown	n/a
6	2.8	Julian Road	unquantified	C1	80.0	80.0	80-80	1	≥90	A	Unknown	n/a
7	2.3	North Bank, Bath Riverside	≥176 / mixed	C1	79.6	80.0	76-82	12	≥90	A	Unknown	n/a
8	2.13	Land East of Station Road	20	C1	78.0	78.0	78-78	1	≥90	A	Unknown	n/a
9	3.3	Ashton Way & Labbott Car Parks	30	C1	78.0	78.0	78-78	1	≥90	A	A	0
10	4.15	Farrington Gurney South	500	E1	50.0	50.0	50-50	1	≥90	A	C	+2
11	5.4	West of Corston Lane	60	E1	46.0	46.0	42-52	7	≥90	A	Unknown	n/a
12	5.8	North of Fox Fields, Hallatrow	50	E1	40.2	40.0	38-44	6	84.9	B	C	+1
13	5.9	West of Clutton	300	E1	39.5	40.0	38-41	12	83.5	B	D	+2
14	2.12	Car Park adjacent to Combe Park	30	C1	74.0	74.0	74-74	1	81.8	B	Unknown	n/a
15	5.13	Hedgehogs, Chew Stoke	100	E1	36.8	37.0	35-38	4	77.2	C	D	+1
16	5.10	Maypole Close	30	E1	36.0	34.0	34-40	3	75.1	C	Unknown	n/a
17	3.7	West Saltford	960	D1	54.4	55.0	46-63	67	74.4	C	B	-1
18	5.12	Old Tennis Courts, Chew Magna	20	E1	35.0	35.0	35-35	1	72.4	C	C	0
19	5.11	North of Temple Cloud	130	E1	34.8	35.0	32-37	8	71.8	C	C	0
20	5.5	Timsbury Road, Farmborough	200	E1	34.8	35.0	32-38	9	71.8	C	D	+1
21	4.6	Haydon	140	D1	52.5	52.0	47-59	15	67.2	D	B	-2
22	3.2	East of Avon Mill Lane	100	C1	66.0	66.0	66-66	1	51.3	E	A	-4
23	5.14	West Bishop Sutton	280	E1	28.7	29.0	28-29	6	50.6	E	F	+1
24	3.8	South Saltford	330	D1	46.3	46.0	40-53	29	41.4	F	C	-3

25	4.1	South Peasedown	860	D1/E1	44.7	46.0	35-50	29	38.6	G	C	-4
26	4.3	Lower Peasedown	80	D1	44.8	46.0	42-46	5	35.7	G	C	-4
27	3.10	Devonport House	50	C1	60.0	60.0	60-60	1	28.2	H	Unknown	n/a
28	3.14	South-West Whitchurch Village	700	C1/F1	55.1	55.0	47-65	68	26.7	H	Unknown	n/a
29	2.10	Bath Equestrian Centre	40	C1	57.8	58.0	57-59	5	21.5	H	B	-6
30	5.6	West Timsbury / Emlett Field	170	D1	40.2	40.5	36-43	6	21.1	H	C	-5
31	3.4	West Keynsham	480	C1	57.0	59.0	43-66	37	19.3	I	A/B*	n/a
32	4.9	Thicket Mead	130	C1	55.3	55.0	53-58	3	15.7	I	B	-7
33	5.7	East Timsbury	240	D1	37.8	38.0	36-41	15	15.7	I	C*	-6
34	4.4	North Radstock	950	C1/E1	46.9	48.0	36-55	71	<10	J	B	-8
35	4.8	Chilcompton Road	160	C1	52.5	52.0	50-55	6	<10	J	Unknown	n/a
36	4.13	Paulton South	300	C1	52.4	52.5	49-55	14	<10	J	Unknown	n/a
37	5.1	Bathford Nurseries	20	C1	52.0	52.0	52-52	1	<10	J	B*	-8
38	3.9	Hicks Gate	2000	C1	51.9	52.0	34-67	123	<10	J	B	-8
39	2.9	Kingswood School Playing Fields	90	C1	50.7	52.0	45-54	10	<10	J	Unknown	n/a
40	2.11	North of Napier Road	40	C1	50.0	50.0	50-50	1	<10	J	Unknown	n/a
41	3.5	South West Keynsham	950	C1	49.3	50.0	31-66	79	<10	J	B*	-8
42	5.3	Ashley Road, Bathford	10	C1	49.0	49.0	49-49	1	<10	J	B*	-8
43	3.1	North Keynsham	1450-1700	C1	47.9	48.0	29-67	104	<10	J	C	-7
44	4.5	Writhlington	300 within B&NES	C1	47.9	48.5	40-54	14	<10	J	C	-7
45	4.11	Farrington Road North	30	C1	47.0	47.0	47-47	1	<10	J	B*	-8
46	4.12	Farrington Road South	70	C1	47.0	47.0	47-47	2	<10	J	B*	-8
47	4.14	Paulton Mendip Close	20	C1	44.0	44.0	44-44	1	<10	J	Unknown	n/a
48	3.6	South East Keynsham	390	C1	42.7	45.0	25-52	36	<10	J	C	-7
49	3.13	East Whitchurch Village	1040	C1	38.7	39.0	30-49	52	<10	J	B	-8

It should also be noted that Paulton's population has already increased by 33% in the past two decades (Table 3), following the redevelopment of the Purnell site with over 500 homes built, yet very little in the way of additional infrastructure or green space. Moreover, Paulton is already one of the most densely populated villages in B&NES (City Population, 2026). Villagers are keen to highlight that Paulton should remain a separate village and not merge with neighbouring settlement such as Midsomer Norton and Farrington Gurney in order to protect its local character and community identity. Paulton residents feel that they have already had their fair allocation of housing and that further housing in the village will lead to more competition for services and green spaces that are already overburdened by the current population.

Table 3 – B&NES ward population increase from 2001–2021 (City Population, 2026)

Ward	2001	2021	% increase
Newton St. Loe	631	1,369	117%
Whitchurch	1,313	1,992	52%
Kelston	257	369	44%
Paulton	4,896	6,503	33%
Stowey-Sutton	1,222	1,623	33%
Keynsham	15,533	19,603	26%
Nempnett Thrubwell	189	228	21%
Farmborough	1,103	1,314	19%
Temple Cloud with Cameley	1,286	1,517	18%
Westfield	5,591	6,543	17%
Midsomer Norton	10,458	12,204	17%
Radstock	5,276	6,154	17%
Clutton	1,529	1,768	16%
West Harptree	459	530	15%
Chew Stoke	905	1,039	15%
Bath	83,992	95,054	13%
Bathampton	1,504	1,698	13%
Dunkerton and Tunley	479	538	12%
Publow and Pensford	1,087	1,200	10%
Compton Martin	508	555	9%
Ubley	335	365	9%
Monkton Combe	556	600	8%
Chew Magna	1,161	1,248	7%
Wellow	511	549	7%
Farrington Gurney	846	906	7%
Camerton	660	702	6%
Bathford	1,753	1,862	6%
Hinton Charterhouse	477	505	6%

Peasedown St. John	6,306	6,673	6%
Batheaston	2,694	2,840	5%
High Littleton	2,086	2,187	5%
Freshford	530	554	5%
Stanton Drew	762	781	2%
Timsbury	2,581	2,639	2%
Combe Hay	149	150	1%
Corston	498	499	0%
Saltford	4,153	4,133	0%
Priston	252	250	-1%
Claverton	149	147	-1%
East Harptree	680	668	-2%
Compton Dando	613	601	-2%
Marksbury	399	388	-3%
Englishcombe	332	321	-3%
Norton Malreward	241	233	-3%
Southstoke	440	420	-5%
Swainswick	284	266	-6%
Shoscombe	462	416	-10%
Hinton Blewett	326	284	-13%
Chelwood	153	125	-18%
Charlcombe	433	336	-22%

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 increase the number of homes built in Bath. The Paulton sites should be removed from the Local Plan.

2. Representation to Policy 1.1, 4 & 6 – Unsound infrastructure provision

The plans for housing in Paulton and other areas of the Somer Valley and nearby rural settlements are unsound due to a lack of justification since they are not based on appropriate evidence. There are therefore also not effective as they are not deliverable without the associated infrastructure required and thus not consistent with the NPPF regarding sustainable development. Further development in this area will have significant impact on the current communities since there are no plans proposed for additional transport infrastructure to ameliorate the existing problems or future issues that will arise as a result of this Local Plan.

2.1 Representation to Policy 1.1, 4 & 6 - Transport

Travelling to work is responsible for the majority of journeys and the Somer Valley and rural sites (excluding the ones in Bath) have extremely high levels of out-commuting to work. The Local Plan has no provision for employment land in Paulton (the SVEZ site is supposedly providing jobs for housing already built) and therefore we can expect out-commuting to increase. Looking at the DfT Connectivity data (Fig. 1; Table 2), the Somer Valley and rural areas have a very limited ability to travel to work by sustainable methods such as public transport (there's no train station, and buses are limited and unreliable), walking (many roads and lanes without pavements, or with very narrow ones where they are present) and cycling (Paulton has no cycle lanes) in comparison to some sites in the Bath and Bristol Corridor and Bath itself. Our Neighbourhood Plan survey has revealed that 88% of commuting journeys in Paulton are made using a private car or van and only 13% of residents walk or cycle as all or part of their journey to work, and only 13% use buses including the Park and Rides due to the rural, dispersed nature of this area, the undulating topography and its distance from major urban settlements with employment (PPC, 2026).

It is also not clear whether the DfT Connectivity score accounts for journeys to Bristol for work in the model, and if not, this would be a major omission in the data, again meaning the Plan is unsound due to lack of justification and insufficient evidence. The DfT says that it does not consider journeys of more than one hour to be a typical daily routine and do not contribute to connectivity (DfT, 2026) and yet commuting to Bristol often takes longer than an hour – 90 minutes is more realistic – and is a normal daily commute from Paulton (Fig. 2).

The Local Plan transport strategy relies on modal switch from the car to buses and active transport, yet aside from an upgraded bus stop in Paulton and unspecified “area wide active travel improvements”, there are no plans to facilitate or encourage residents to make this switch (B&NES, 2026e). The allocated sites in Paulton (B&NES, 2026f, Chapter 4 – Somer Valley, p.80) are on B or C/unclassified roads, which are already struggling to cope with the increase in traffic that has been seen over the past two decades with housing growth in the village and in the wider Somer Valley. The sites allocated are only accessible through narrow lanes and entrances via other housing estates (Fig. 8), some of which are also prone to flooding in wet weather. For example, approach to Paulton South (p.89) is proposed through a busy housing estate, near to the primary school and swimming pool, where access, congestion and parking is already an issue. Old Mills Lane, shown elsewhere in the Local Plan to be proposed as a quiet lane for active travel and closed to through traffic, cuts through the Paulton South site and is a one-track lane on a steep hill. Traffic jams are an everyday occurrence in Paulton and the Somer Valley especially during the morning and evening commutes and school drop-off and collection times. It should also be noted that 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 B&NES. Road closures due to accidents or maintenance result in traffic diversions for buses that mean villages including Paulton are cut off from public transport. Buses are unreliable, journey times are long, the distance to bus stops from some of the proposed sites is more

than that recommended by B&NES and there is limited connection between villages therefore car transport is the preferred choice. This means that building on these sites results in residents being unable to meet their daily needs locally, in a place where walking and cycling are realistic for shorter trips. B&NES Council are aware of this and indeed previous applications for housing on the Farrington Road and Paulton South sites have been refused previously, in part due to objections from Highways owing to the transport issues.

Looking at the underlying data in the Transport Topic Paper (B&NES, 2026e), building on the sites in Paulton and Hallatrow will increase daily car trips by 371 cars without mitigation, and the mitigation only reduces this by 4.58% (B&NES 2026e, 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 2026e, 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 traffic impact has not been fully evidenced. Thus, 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) requiring new housing to be built in areas that will reduce travel distances and car dependency. Building in unsustainable locations such as Paulton is unsound and not legally compliant with the NPPF.

Modifications required: Develop a functional transport strategy with effective mitigations. The Paulton sites should be removed from the Local Plan.

2.2 Representation to Policy 4 and 6 – Sewage Waste Management

One of the most fundamental constraints to further development in Paulton is the sewage system, which is struggling to cope with the amount of sewage currently generated. The Bovis half of the Purnell site in Paulton has still not been adopted by B&NES after a decade due to the outstanding sewer adoption. Sewage issues are frequent with 363 sewage discharges into the Cam Brook in 2025, making it in the top 8% of waterways in the country for sewage spills (TotPs, 2026). Paulton residents also frequently note sewage issues, with sewage pipes rupturing in their gardens and into the Oxleaze nature reserve field (due to be designated as a Local Green Space in Paulton's Neighbourhood Plan and next to new allotments, a wildlife pond and the Cam Brook) at the bottom of Claxton Close in the Bovis development (Figure 3).

This issue is particularly pertinent given that Cam Brook area is also designated by B&NES as a Site of Nature Conservation Interest (Policy NE3), part of the Grassland and Wetland Strategic Networks (Policy NE5), Priority Grassland Habitat (BRERC) (Potential Irreplaceable Habitat, Unconfirmed) and Green Infrastructure (Policy NE1) (Figure 4). It is designated by WECA as a Local Nature Recovery Site, as an Area of Importance for Biodiversity and a Focus Area for Nature Recovery. Beavers – a protected species – have been found in the Cam Brook

in Paulton, alongside various small mammals including otters, bats and many birds using the waterway.

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 warned Wessex Water in 2022 that unless it improved its sewage facilities, no new homes should be built in Paulton and the surrounding Cam Brook catchment area. The Wessex Water Paulton Water Recycling Centre 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 Paulton, 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, 2026g). 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 and the forthcoming SVEZ. Therefore, Paulton and other villages served by the Paulton WRC would require a new sewage treatment works built at a new location, and this has not been costed in the Plan (B&NES IDP, 2026g). Building in Paulton and surrounding 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, 2026h) 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: Determine the cost of the infrastructure required for a new water recycling centre to serve Paulton and the surrounding catchment areas. Remove all sites from the Local Plan that have sewage managed by Paulton WRC: Paulton, Farrington Gurney, Hallatrow, Clutton, Temple Cloud and Timsbury.

2.3 Representation to Policy 4 & 6 – Infrastructure – Water

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 Paulton and other sites in 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, yet no details have been provided regarding the cost of any infrastructure that might be required and who would fund this (B&NES IDP, 2026g). 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.

2.4 Representation to Policy 4 & 6 - Health Infrastructure

The Local Plan is unsound in terms of health care because B&NES admit that there is already insufficient capacity in the Somer Valley and surrounding rural areas and 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, aside from acknowledging growth here will increase health care demand, *“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 2026g IDP p.14). 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). In Paulton, Elm Hayes Surgery is already at 101% capacity, and residents struggle to make appointments. The local dentist changed from NHS to private, making it out of the reach of most residents. 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 Paulton 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.

3. Specific sites in Paulton

3.1 Representation to Policy 4.11 & 4.12 - Farrington Road North & South

The Farrington Road North site has a current planning application (25/03044/OUT), with over 300 objections from Paulton residents. Building here was previously refused by B&NES in 2022 for the following reasons that are still applicable:

- Outside of the current Housing Development Boundary
- Loss of Grade 1 best and most versatile agricultural land
- Unsustainably connected as Paulton does not have the extent and quality of facilities and amenities and the level of job opportunities available required to prevent travel by private car and options for active travel and public transport are limited
- Unsafe highway visibility therefore insufficient access

- Adverse impacts on the landscape contrary to Policy NE2A, which protect and enhance the visual setting of towns and villages

Similarly, Farrington Road South was refused planning permission in 2014 (13/03547/OUT) and lost an appeal for the following reasons that are still relevant:

- Outside of the current Housing Development Boundary
- Unsustainable development due to car dependency and poor access to services
- Mineral safeguarding (32%) and undesignated Heritage Asset
- Adverse impacts on the landscape contrary to Policies NE2A

3.1.1 Unstable travel choice

The Farrington Road sites are on the periphery of Paulton, outside of the Housing Development Boundary. Bus stops are located approximately 650m from the proposed entrance to the Farrington Road North site and therefore even further away for the houses proposed to be built further to the north of this site. This means that the recommended maximum walking distances would be exceeded for access to bus services and therefore building homes here would not provide the genuine choice of a sustainable mode of travel. Furthermore, there are no adequate pavements connecting the site to shops and services in Paulton for walking, and the crossing on Farrington Road is on a dangerous junction with a lack of visibility. Similarly, there have been several accidents including fatalities in recent years on Farrington Road. Building homes on this site does not offer a sustainable travel choice, is against the NPPF and not a justified approach, making the Local Plan unsound.

3.1.2 Ground instability

Paulton is formally a coal mining village in the Somerset Coalfield, the whole area bears the remnants of mining substructures particularly in the Farrington Road North site and are not mapped, nor not noted on any official documents. Residents of adjoining Downsway have reported subsidence issues owing to the collapse of mines under their homes. 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.

3.1.3 Grade 1 Agricultural Land

The Farrington Road sites are classified as the best and most versatile agricultural land. Farrington Road North is Grade 1 (Figure 5) and is in active use for grazing and hay production. Farrington Road South is Grade 3 and 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). Furthermore, 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. Other sites in the Local Plan e.g. Farrington North have

been discounted for development due the presence of Grade 1 agricultural land and being in active use (B&NES SAR 2026h), so it is inconsistent and therefore unjustified to proceed the Farrington Road sites, rendering the plan unsound and against the NPPF.

3.1.4 Biodiversity

B&NES declared an ecological emergency in 2020, and building on the Farrington Road sites is incongruent with this. 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.

3.1.5 Policy NE2A Landscape Setting of Settlements

All Paulton sites including Farrington North and South are covered by Policy NE2A Landscape Settling of Settlements designed to protect and enhance the visual setting of towns and villages (Figure 6). 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's (B&NES Site Selection Topic Paper, 2026i). Furthermore, Farrington Road North is part of HELAA site PAU12, but there is no entry for PAU12 on the Site Selection Topic Paper spreadsheet, 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. Retaining the allocation 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.

3.1.6 Flooding

Flooding is common in Paulton and the surrounding areas, including at the Farrington Road sites (Figure 7). B&NES note in their Strategic Flood Risk Assessments (B&NES 2021) that flooding may be possible in the future due to climate change, but flooding across the roads as shown (Figure 7) is already a regular occurrence when there is heavy rain. In fact, all the Paulton sites are subject to substantial flooding in the winter, despite the information provided in the Level 1 Strategic Flood Risk Assessments for Paulton (B&NES, 2026j). Building in such areas goes against B&NES' plan for climate resilience and is against the NPPF for sustainable development.

3.1.7 Open Space

Farrington Road North has 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 Paulton residents. The Local Plan's Open Space Assessment Appendix (B&NES, 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: Remove the Farrington Road sites from the Local Plan. These sites constitute unsustainable development due to car dependency and are therefore against the NPPF. B&NES have not assessed ground stability in this former mining area and failed to appreciate the extent of flooding therefore the Local Plan is not sound due to a lack of evidence provided for justification. The land contains Grade 1 (and probably Grade 3a) best and most versatile agricultural land that should be protected from development and building here will impact biodiversity including that of eight protected species of foraging bats identified through ecological surveys because it is on or adjacent to Priority Grassland Habitat, therefore building here is not justified because it is not based on the available evidence. Provide an explanation regarding how Policy NE2A has been applied considering site allocation decisions.

3.2 Representation to Policy 4.13 & 4.14 - Paulton South & Mendip Close

The Paulton South and Mendip Close sites were added to the Reg. 19 consultation and were not included in the previous Local Plan Reg. 18 consultation. For Paulton South, this was due to the sensitivity of the landscape and its Policy NE2A Landscape Settling of Settlements designation that to protects and enhances the visual setting of towns and villages (Figure 6). For Mendip Close, this is not a site that has been considered previously through the HELAA assessment, therefore there is very little known about its suitability for development and it is not included in the Site Selection Topic Paper. This lack of consultation is not compliant with the legislation in the Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 and therefore not legally compliant in terms of the NPPF. Paulton Parish Council and its residents and other relevant parties have not been given sufficient opportunity for consultation to assess and comment on the site's inclusion in the Draft Local Plan. Furthermore, the last-minute inclusion into Reg. 19 of these sites means that the Local Plan is unsound as it is not based on the available evidence as site assessment is less extensive than that of previously included sites.

3.2.1 Unstainable travel choice

The Paulton South and Mendip Close sites are on the periphery of Paulton, outside of the Housing Development Boundary. They are not on local bus routes and there is limited bus service (B&NES SSTP 2026i). It is likely that the recommended maximum walking distances would be exceeded for access to bus services and therefore building homes here would not provide the genuine choice of a sustainable mode of travel. The proposed approach to Paulton South is via a busy housing estate, near to the primary school and swimming pool,

where access, congestion and parking is already an issue. Old Mills Lane, shown elsewhere in the Local Plan to be proposed as a quiet lane for active travel and closed to through traffic, cuts through the Paulton South site and is a one-track lane on a steep hill. Building homes on this site therefore does not offer a sustainable travel choice, is against the NPPF and not a justified approach, making the Local Plan unsound. Mendip Close has very narrow access and is not suitable for an entryway into a new housing site (Figure 8).

3.2.3 Land unavailable for development

Paulton South has land that is not available for development (i.e. landowners are not willing to sell), and therefore the Local Plan is not effective as it is undeliverable with inclusion of this site. This is pertinent because this is the reason that is stated for the removal of the Paulton East sites from the previous Reg. 18 Local Plan consultation (B&NES 2026l).

3.2.4 Grade 3 Agricultural Land

The Paulton South site is classified as potentially the best and most versatile agricultural land (Grade 3). B&NES have not assessed this 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. Both sites are productive farmland used for grazing cattle.

3.2.5 Policy NE2A Landscape Setting of Settlements

The Paulton South and Mendip Close sites are covered by Policy NE2A and the mitigations proposed for Paulton South (meadow and wood pasture creation) are considered insufficient to adequately address the adverse effects on the landscape, as houses will still be visible in the setting. If part of the land is genuinely to be allocated for landscape mitigation, then it should be designated as Local Green Space, as reviewed and allocated elsewhere during the Local Plan process, in line with the NPPF. Mendip Close has no mitigations proposed to prevent landscape harm in the Local Plan relevant to policy NE2A and therefore unacceptable harm to the landscape setting will be caused by building here. The absence of such mitigation when proposing to building on an NE2A site shows the lack of positive planning in the decision making process for site selection. This means it is not sufficiently justified and therefore unsound.

3.2.6 Heritage

The Paulton South site is noted to contain undesignated heritage assets likely to be related to Paulton's mining history. No detail is provided as to what these assets are or where they are located, therefore the Plan is unjustified as it is not based on appropriate evidence. A medieval field system (including ancient hedgerows and dry-stone walls) is also noted for Paulton South in the Site Selection Topic Paper (B&NES 2026i), and this historic site will be lost to development, which is unacceptable in the view of Paulton Parish Council.

Modifications required: Remove the Paulton South and Mendip Close sites from the Local Plan. Paulton South has land which is not available for development (i.e. landowners are not willing to sell), and therefore the Local Plan is not effective and as it is undeliverable with inclusion of this site. These sites constitute unsustainable development due to car dependency and are therefore against the NPPF. The sites should be assessed to determine the presence of Grade 3a best and most versatile agricultural land. The heritage of the area should be assessed considering the presence of the medieval field system and undesignated heritage assets. An explanation should be provided regarding how Policy NE2A has been applied considering site allocation decisions. Paulton South should be added as a Local Green Space since it is so important for protection of the landscape setting of Paulton under NE2A.

Representation on Legal Compliance of The 2025 Consultation Statement

The plan is not legally compliant for the following reasons:

1. Not supported by a timely Sustainability Appraisal - the SA was only made available on the 9th of October, yet the consultation deadline overall remained the 30th of October.
2. 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 attending 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.
3. New sites were added into the Reg. 19 consultation that were not in the Reg. 18 consultation e.g. 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.
4. 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 (B&NES 2026f, Chapter 4 - Somer Valley) as shown on the HELAA (Figure 9).
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, 2026m). This is not true; we had a consultation in for a very minimal change to the Paulton HDB in July 2025, not the substantial changes shown in SBR Topic Paper (Figure 10). Given that the ‘option’ sites for Paulton in 2025 were for Paulton East, rather than Paulton South, 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. If B&NES continues to claim that they consulted with the parishes, they should supply the evidence.

6. **Comments from previous consultation do not reflect reviews submitted.**
- Paulton 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 2026l). 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, heritage. PPC feel that this separation is unlikely since these constraints to development apply to both sites. 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.

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