

HAVE YOUR SAY! FARRINGTON GURNEY NEEDS YOUR VOICE

B&NES LOCAL PLAN CONSULTATION — PROPOSED 500 NEW HOMES

Deadline: Friday 30 October 2026 before 5pm

Your response must be received by B&NES before the consultation closes.

B&NES is proposing approximately 500 new homes south of Farrington Gurney under **Policy 4.15**. This could affect traffic, air quality, schools, water and sewage systems, local services and the future of our village.

Please take the time to submit your comments. You do not need to be a planning expert. The Parish Council has prepared a Local Plan Statement containing arguments, evidence and references to help you.

Before you begin — important!

- **Use the Parish Council's Local Plan Statement** to understand the concerns and supporting evidence.
- **Write in your own words.** You can use the Parish Council's facts, arguments and references, but explain why they matter to you.
- **Avoid copying the entire statement.** B&NES encourages people with identical views to make a joint representation rather than submitting large numbers of repeated responses. *Identical comments are not automatically disregarded, but there has been indication that copied statements will be grouped together and not as impactful as different expressions on the same policy.*
- **Explain what you want changed.** For example, ask B&NES to remove Policy 4.15 from the Local Plan, giving your reasons.

Option 1 — Submit your comments online

1. Open the official B&NES website: [Local Plan Consultation](#).
2. Select **Submit a Representation** or go directly to the [online response form](#).
3. Complete **Part A** with your name, address and contact details.
4. In **Part B**, identify the part of the plan you are commenting on: **Policy 4.15 – Farrington Gurney South**.
5. Answer the questions about whether you believe the plan is legally compliant and sound. If you believe the policy is unsound, select **No** for soundness.
6. In **Question 5**, explain your concerns and include evidence or references where possible.
7. In **Question 6**, explain what change you want B&NES to make and why.
8. Complete the declaration and any required questions, then click **Submit**.

Important: The form asks for a separate response for each policy, paragraph or site you wish to challenge. You can include several related concerns about Policy 4.15 within one response.

Option 2 — Attach your own written document - You can prepare your response in a Word document, then save it as a **PDF** and attach it to the online form.

1. Write your response in your own words, using the Parish Council's evidence and references.
2. Include your name and clearly title the document **Response to Policy 4.15 – Farrington Gurney South**.
3. Save your document as a PDF.
4. Open the [online representation form](#).
5. Complete your personal details and identify Policy 4.15.

6. Answer the required questions. In Question 5, briefly summarise your concerns and refer to your attached document. In Question 6, state the change you are requesting.
7. Near the end of the form, find **Upload supporting evidence** and select your PDF.
8. Complete the declaration and submit the form ***Please note:** Attaching a document does not replace completing the required sections of the online form. Your PDF provides the fuller explanation and evidence. B&NES's current online form specifically accepts PDF attachments.

Option 3 — Send your response by post - If you prefer to respond on paper:

1. Visit the [B&NES consultation website](#).
2. Download and print the **Regulation 19 Representation Form**.
3. Complete Part A with your personal details.
4. Complete Part B, identifying Policy 4.15 and explaining your concerns and requested changes.
5. Attach extra pages with your arguments and evidence if needed.
6. Post everything to:

Planning Policy Team

Bath & North East Somerset Council, Lewis House, Manvers Street Bath BA1 1JG

Recommended posting date: Monday 26 October 2026

If using Royal Mail First Class, we recommend posting by **Monday 26 October**, allowing several working days for delivery. First Class aims for next-working-day delivery, but this is not guaranteed. If posting after Monday, consider submitting online or by email instead.

Option 4 — Send the completed form by email

You can also **email your completed Regulation 19 Representation Form and supporting document to: planning_policy@bathnes.gov.uk**

Use the subject line: *Local Plan Representation – Policy 4.15 Farrington Gurney South.*

Attach your completed form and supporting PDF, and request confirmation of receipt. B&NES confirms that email is an accepted submission method.

What should your response say?

Keep it simple and focus on three things:

1. **What concerns you?** For example, increased traffic, air pollution, school capacity or pressure on water and sewage systems.
2. **What evidence supports your concerns?** Use facts and references from the Parish Council's Local Plan Statement, alongside your own experiences where relevant.
3. **What do you want changed?** Explain why you believe Policy 4.15 should be removed or changed.

The consultation focuses on whether the Local Plan is *sound* — meaning it is properly supported by evidence, realistic, deliverable and consistent with national planning policy. You do not have to discuss every issue. Concentrate on the points you understand and feel are most important.

Final checklist

I have used my own words, supported by evidence where possible.

I have identified Policy 4.15 – Farrington Gurney South.

I have explained my concerns and what I want changed.

I have completed the required form sections.

I have attached my supporting document, if using one.

I have submitted my response before the deadline.

Need help? Contact B&NES Planning Policy Team on **01225 394041** or email planning_policy@bathnes.gov.uk.

Please make your voice heard. The future of Farrington Gurney matters.

Objections Against the Farrington Gurney South Housing Allocation Policy 4.15

from Farrington Gurney Parish Council

B&NES Draft Local Plan 2025 to 2043 Policy 4.15

Argument and Evidence Review 22 October 2026

Policy 4.15 Farrington Gurney South should be deleted as presently proposed because the allocation is insufficiently justified and its essential infrastructure and mitigation have not been demonstrated to be deliverable. The Council's own evidence identifies limited wastewater capacity, unresolved infrastructure costs and substantial residual car dependence. The case below explains why those dependencies, combined with the scale of village expansion and environmental assessment discrepancies, undermine the allocation's soundness.

This representation challenges the allocation against the soundness tests of justification, effectiveness and consistency with national policy. The Council does not demonstrate why around 500 homes at this location are preferable to reasonable alternatives and how safe access, education, healthcare, wastewater treatment and environmental mitigation can be delivered together. The requested change is deletion of Policy 4.15, the Farrington Gurney allocation.

This representation groups the objections to Policy 4.15 by topic.

Topics Covered

Scale, Location and Reasonable Alternatives

Site Capacity, Landscape and Physical Constraints

Cumulative Transport, Access, Safety and Sustainable Travel

Air Quality and Exposure

Primary, Secondary and Specialist Education

Healthcare, Community Facilities and Utilities

Financial Viability, Affordable Housing and Delivery

Ecology and Habitats Regulations Assessment

Consultation and Access to Evidence

Overall Case and Requested Modifications

Scale, Location and Reasonable Alternatives

Disproportionate expansion and the unexplained change in scale

500 homes would represent a fundamental change in the scale and character of Farrington Gurney. The village growth from the allocation is 133% from 367 homes to 867 homes. The proposed addition itself requires an explanation of how a small village would absorb a major increase in households, service demand and traffic within the plan period without impacting the social cohesion, character, identity and nature of the village. This proposal essentially bolts on a new village, larger than the one that currently exists and effectively separates it from Farrington Gurney via the main through road of the A362, creating a larger separate community across from a close-knit cohesive village. Village residents experience a distinct community; planners may see a settlement near a road corridor, employment area and neighbouring towns. People live in rural villages for many reasons. Allocating high quantities of rural housing to relieve a district wide number burden fundamentally alters small strongly connected communities where rural residents experience civic social cohesion differently than larger settlements. The proposed allocation would create a substantial new residential area separated from much of the existing village by the A362. Its assessment should therefore address community cohesion alongside transport accessibility and infrastructure capacity. B&NES should demonstrate how safe, accessible connections and sufficient shared facilities would support integration between existing and new residents, and explain how the effects on settlement character and community cohesion informed its comparison with smaller alternatives. The Parish Council is not saying no to the affordable housing problem, it questions the primary feasibility that actually meets the affordable housing problem and the sacrificial scale that undermines rural villages.

B&NES's earlier indicative neighbourhood housing requirement, recorded by AECOM was 36, followed by a later 1000, home proposal and a 50-home option and finally the present proposal around a 500-home allocation, first requires a transparent explanation of the large-scale change in planning rationale beyond meeting a government target and how this appropriate to a rural village. The evidence does not sufficiently publish why this option is justified for the village and reasons for rejection of a figure that would be more sustainable and in line with nature and resources of the village. A housing target does not explain why this particular settlement should accommodate a 133% increase that fundamentally changes the nature and identity of the village into two distinct halves.

Policy 4.15 raises an unresolved question about the compatibility of approximately 500 homes and associated infrastructure with Farrington Gurney's landscape setting. The Council recognises the southern escarpment as a boundary for development and the nearby Mendip Hills landscape as integral to the village's setting, while requiring a subsequent Landscape Visual Impact Assessment of the southern hillside and other sensitive features. Does the proposed mitigation protect character as well as screens buildings? Requirement 31 specifies boundary greenspace averaging 20 metres wide. Its adequacy depends on views, topography, building heights, lighting

and settlement form. A landscape buffer does not automatically demonstrate that the wider change to the village's setting is acceptable. *Policy 4.15, p.104.*

The relevant issue is whether the plan-stage landscape evidence demonstrates that the proposed capacity can be accommodated without unacceptable harm to these characteristics. Boundary planting and greenspace may mitigate visual effects, but do not, by themselves, establish that the change to settlement form and countryside character is acceptable. This requires assessment against the NPPF's countryside objectives, alongside development needs and reasonable alternatives.

Evidence: Draft Local Plan, Chapter 4, p.97, paragraph 4.111; Policy 4.15, requirements 1, 27, 29 and 31, pp.100–104; current NPPF, Chapter 4, introductory objective.

The objection is that the allocation's scale has not been adequately justified against the village's existing capacity and reasonable smaller alternatives. An assessment that labels Farrington Gurney moderately sustainable, then relies on new infrastructure to support strategic growth, must demonstrate that the necessary transformation is reasonable, justified, feasible, deliverable and does not cause harm to the landscape setting and characteristics. Without that full demonstration, the allocation fails the justified and effective tests of soundness.

District need does not establish the appropriate village allocation

District-wide housing need does not, by itself, justify allocating 500 homes at Farrington Gurney South. The Farrington Gurney Neighbourhood Plan Housing Needs Assessment, Final Report, April 2025, p.11, paragraph 2.5.2, records an indicative B&NES housing requirement of 36 dwellings, increased from 18 following the Standard Method change. The Council should explain why Farrington Gurney is an appropriate place for 500 homes, more than doubling the size of the village, and show how that is sustainable to the village.

Evidence: Housing Needs Assessment, April 2025, p.11, paragraph 2.5.2.; Draft Local Plan, Chapter 4, pp.97–103.

Greater priority should be given to suitable previously developed land and town centre regeneration, particularly where transport links, infrastructure and jobs are already in place. Larger sites in more accessible locations, including the Bristol–Bath corridor, should also be assessed for their potential to deliver a higher proportion of affordable homes.

The Council has not justified how the proposed site and scale compared with identified, available alternatives on housing yield, delivery dates, infrastructure cost, sustainable access, agricultural land, landscape and settlement character. The SA, pp. 34–35, records why land north and west of Farrington Gurney was discounted and identifies other possible Somer Valley land, including industrial sites that might instead be used for housing.

The SA, p. 35, says the southern site is presently considered the most suitable within Farrington Gurney, while also recording that further information on its agricultural land grade was being provided. It should also explain the site's contribution to the wider housing strategy beyond meeting a target and relative to the environmental, accessibility, and infrastructure effects of expanding this particular settlement on the proposed scale.

Before allocating substantial greenfield land in Farrington Gurney, the Council should publish clear evidence of the housing reasonable alternatives could deliver, their costs and transport impacts, and why development on this scale in this village is justified.

Evidence: Sustainability Appraisal, pp.24–26, 34–35 and 50; Identifying Sites for Allocation Topic Paper, pp.12–14; Chapter 4, pp.97–103.

Farrington Gurney is identified as a Tier 3, moderately sustainable settlement in the Identifying Sites for Allocation Topic Paper, pp. 8–12. The paper explains the Council’s positive case: a moderate range of local facilities, an A37 public-transport corridor, proposed Somer Valley Links improvements, potential links to Midsomer Norton and proximity to employment at the Somer Valley Enterprise Zone. They do not, without further comparison, establish that approximately 500 homes south of this village are the most appropriate way to meet the district housing targets whilst dismissing the feasible needs and projections formulated in the Farrington Gurney Neighborhood Plan.

The Council should explain the weight given to current connectivity and to improvements that depend on future delivery. It must demonstrate that the southern allocation has safe routes to services and realistic alternatives to car travel, and identify the infrastructure and service commitments underpinning that assessment.

The proposed scale must be adequately assessed against access to employment, education, healthcare and community facilities. The plan itself acknowledges significant out-commuting and car reliance in the Somer Valley even with mitigation. The Council does not fully explain how the Farrington Gurney allocation would address the present existing pressures in the village and achieve *significant* mitigation numbers that justify such an enormous expense. It also must provide how its employment and transport assumptions have been specifically tested for Farrington Gurney.

Evidence: Identifying Sites for Allocation Topic Paper, pp.8–12, particularly paragraphs 6.3–6.4 and Table 2; Transport Topic Paper, p.25, Figure 4.4; Chapter 4, p.5, paragraph 4.6.

Housing growth must be assessed against the timing, accessibility, and suitability of employment. The Council’s acknowledged out-commuting problem would be compounded if the new households arrive before sufficient local jobs and reliable transport connections are available. The small-scale employment required on the allocation has not been shown to offset its workforce demand. Proximity to the Enterprise Zone is an assumption about opportunity dating back from 2007. We are 19 years later and the SVEZ land is still in compulsory purchase negotiations. Counting SVEZ with an estimated 1300 jobs for 1,584 new homes for Farrington Gurney, Midsomer Norton, Paulton, Temple Cloud and High Littleton falls very far from any real effects of job solutions locally. This says even less about a combined 4,609 homes from the wider Somer Valley all in proximity to Farrington Gurney. The allocation thus needs evidence of delivery dates, occupiers, job types and realistic travel patterns.

The Council should demonstrate why a strategy directing substantial housing to settlements distant from Bath’s employment and services is preferable to reasonable options with better existing accessibility. The assessment should compare actual access to jobs, total travel demand, infrastructure costs and housing affordability. Maintaining Bath’s heritage setting while

transferring greater traffic, land take and service pressures to rural communities requires an explicit assessment of the resulting environmental and social trade-offs.

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. The case requires identified sites and quantified effects; it should receive a reasoned response alongside brownfield regeneration and other accessible alternatives.

Housing delivery assumptions and additional growth beyond the allocation

B&NES historic delivery of approximately 700 homes per year with a requirement approaching 1,500 is confounding at this scale, given precedents of promises of necessary infrastructure made but not delivered. B&NES should demonstrate how essential infrastructure for Farrington Gurney South will be funded and delivered when needed. Local experience shows that commitments can remain outstanding for years. At Paulton's former Purnell printworks, the February 2023 planning committee record documents concerns that a nursery expected in 2015 remained unbuilt and that a roundabout required under the earlier Section 106 agreement was still outstanding. In Radstock, a school footbridge supported by a £174,000 developer contribution agreed in 2014 only reached construction in February 2023, approximately nine years later.

Policy 4.15 should therefore be supported by a clear infrastructure programme identifying funding, responsible providers, delivery dates and enforceable triggers linked to housing occupation, particularly for the school, safe access and transport improvements. B&NES does not identify the relevant figures and explain how the trajectory can be achieved without advancing housing ahead of essential infrastructure. The relationship between delivery rates, the stepped requirement, five-year supply and infrastructure lead times is material to whether strategic allocations are effective over the plan period.

The Council must show how the infrastructure programme remains adequate if further housing comes forward alongside Policy 4.15. The cumulative case should include committed development, foreseeable additional growth and relevant neighboring authority development, and explain how capacity and funding would be coordinated across sites. Infrastructure sized only for the allocation, if not designated as a maximum development number, leaves a material weakness in the strategy.

Evidence: Chapter 4, paragraphs 4.6 and 4.12 and pp.97–103; Housing Needs Assessment, April 2025, p.11 paragraph 2.5.2; earlier site options; Policy 1.2 and Housing Supply Topic Paper. Working-note figures remain subject to the checks below.

Change or evidence sought: Publish a transparent comparison explaining why approximately 500 homes at Farrington Gurney South are preferable to reasonable smaller allocations and alternative locations. Compare infrastructure capacity and costs, access to employment and services, housing benefits, landscape effects and cumulative growth. Explain the change from

earlier housing options and demonstrate that the proposed scale and delivery trajectory are justified. The Parish Council seeks deletion of Policy 4.15 as presently proposed and reassessment of the housing distribution.

Site Capacity, Landscape and Physical Constraints

Gross site area and the complete development package

The Stage 2 Viability Assessment identifies South Farrington Gurney, A37PS13, as a 504-dwelling site of approximately 20.7 hectares. That gross area needs to be reconciled with the allocation boundary and the developable area after infrastructure and environmental constraints.

The Council should demonstrate how around 500 homes, the primary school, employment space, travel hub, access roads, drainage, public open space and ecological buffers can be accommodated together. The pressurised sewage main and its necessary easement or clearance must be included in that assessment.

For 500 dwellings, illustrative net residential land requirements are 16.67 hectares at 30 dwellings per hectare, 14.29 hectares at 35, and 12.50 hectares at 40. The Council should identify the net residential area remaining after the school, travel hub, drainage, ecological buffers and other infrastructure are accommodated, and demonstrate that the proposed housing density and layout are feasible.

Evidence: Stage 2 Viability Assessment, p.21.; Chapter 4, pp.99–103, Figure 4.18 and Policy 4.15, including the sewage-main constraint on p.101.

Agricultural land landscape and settlement character

The impact on settlement character, the village's landscape setting and the relationship between the new development and the existing community should be assessed at the proposed scale. The Council should explain how the masterplan and infrastructure would maintain practical connections across the A362 and protect identified landscape and heritage features of the village.

Evidence: SA, pp.34–36; Chapter 4, pp.97–103, paragraphs 4.110–4.114 and Policy 4.15.

Agricultural land grading and the justification for the allocation

Existing agricultural grading evidence must be reconciled with the current allocation. The 2025 Local Plan Options Document, paragraph 7.136, explicitly identifies land adjacent to Farrington Gurney, to the south, as Grade 3a, and recognises Grades 1 and 3a as respectively best and most versatile agricultural land. A detailed 1990 MAFF survey of Cliff Farm, Farrington Gurney, published by Natural England as ALCB00490, maps both Grade 3a and Grade 3b, including land south of the A362. The Council must account for this existing evidence when assessing the allocation.

The MAFF survey records 51.2% Grade 3a and 48.8% Grade 3b across its surveyed agricultural area. These proportions relate to the survey boundary. B&NES should overlay that survey with the current Policy 4.15 boundary and identify the hectares of each grade affected, distinguishing land proposed for development from land retained for open space, buffers and other uses.

The 2026 Sustainability Appraisal, printed pages 34–35, describes the southern site as containing a small area of Grade 1 farmland and predominantly Grade 3 land, while stating that the landowner is providing further grading information. However, the October 2026 Site Assessment Appendix, PDF page 84, records the 34.98-hectare A37PS13 assessment site as 51% Grade 1, 2% Grade 2 and 47% Grade 3. This assessment boundary is larger than the 20.68-hectare site used in the viability appraisal. The Council must clarify how these different boundaries and classifications relate to the land actually allocated. B&NES should identify the technical evidence supporting its conclusions, 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.

The objection is therefore that the allocation's justification does not transparently reconcile the existing detailed survey, the earlier explicit Grade 3a description, the later assessment findings and the different site boundaries. Without a consistent account of the quality and extent of agricultural land affected, the Council has not adequately demonstrated that its site selection and proposed development capacity are justified. This is a substantive weakness against the justified test of soundness.

Evidence: Local Plan Options Document 2025 — Farrington Gurney extract, paragraph 7.136, PDF page 1, Natural England — detailed MAFF survey ALCB00490, Cliff Farm, February 1990, classification map page 1, Sustainability Appraisal 2026, printed pages 34–35, Site Assessment Appendix, October 2026, PDF page 84, A37PS13, Stage 2 Viability Assessment, Appendix 3, Table 3n, PDF page 15.

Ground conditions flood risk and drainage

B&NES should identify the relevant ground-condition, contamination, mining-risk and flood-risk evidence, demonstrate feasible drainage, and account for the resulting land take and abnormal costs. These physical constraints must be reflected in the assessment of site capacity and deliverability.

The mining legacy around Marsh Lane requires specific assessment before the proposed development capacity can be regarded as justified. British Geological Survey records identify Marsh Lane Colliery at grid reference ST 6321 5526 and confirm workings in the Rudge and 21 Inch coal seams. B&NES should overlay available mine plans, recorded entries and mining-risk mapping with the current allocation boundary, identifying the extent and depth of workings that could affect development. Government guidance recognises mining hazards as a consideration in plan preparation, while Mining Remediation Authority guidance explains that mine-entry locations and any necessary no-build zones must inform development layout and capacity. Policy 4.15's requirement for a land-quality investigation does not, by itself, demonstrate that mining-related stability, mine gas and drainage interactions have been assessed. Proportionate evidence

should establish whether these risks arise, what investigation or remediation is necessary, and the implications for housing, the school, access roads, utilities and sustainable drainage. Any resulting exclusion areas, engineering requirements, costs and delays must be reflected in the allocation's land budget, viability and delivery programme. Historic mining does not establish that development is impossible, but its implications must be resolved sufficiently to support the proposed scale.

Evidence: British Geological Survey, Bristol district: Memoir for geological special sheet, discussion of the Rudge Vein and 21 Inch Vein at Marsh Lane Colliery; Government Planning Practice Guidance, Land stability, paragraphs 003, 005 and 010; Mining Remediation Authority, Planning applications and Coal Mining Risk Assessments, sections "The Coal Mining Risk Assessment" and "Content of a Coal Mining Risk Assessment"; Chapter 4, Policy 4.15, p.103, requirement 25.

Change or evidence sought: Provide a proportionate capacity and constraints assessment showing that the full policy package fits within the correct boundary. If it does not, reduce the allocation or revise its boundary only after reassessing the environmental and infrastructure consequences.

The land budget must demonstrate capacity for the entire allocation

B&NES should publish a clear land-use budget demonstrating how all the requirements of Policy 4.15 can be accommodated within the Farrington Gurney South allocation. Using the stated site area of 20.68 hectares, and assuming a net residential density of 35 dwellings per hectare, around 500 homes would require approximately 14.29 hectares. Department for Education guidance indicates approximately 0.90–1.12 hectares for a 210-place primary school, although B&NES needs to confirm the actual school-site allowance (BB103, Annex B, printed page 44). An illustrative 50-space parking area would require approximately 0.125 hectares, using an allowance of 25 square metres per space including circulation. This is a comparator drawn from another council's planning study, rather than a confirmed Farrington Gurney design, and additional land may be needed for the hub's other facilities. Policy 4.15 leaves the hub's detailed specification to master planning and anticipates that it will not exceed 100 spaces; it does not fix its capacity at 50. Together, these illustrative allowances would leave approximately 5.15–5.37 hectares for the remaining requirements, including employment space, additional infrastructure, open space, sustainable drainage, landscaping and ecological buffers, allowing for legitimate overlap between uses.

The concern is transparency and the evidence supporting the proposed capacity. Residents should be able to understand how its proposed capacity has been established. B&NES should therefore publish the confirmed gross site area, net developable residential area, assumed density and individual land allowances, supported by a plan showing how all policy requirements fit within the boundary without double-counting. This would allow the deliverability of the allocation to be assessed on a clear and consistent basis.

The plan's environmental and infrastructure requirements consume land as well as money. If the complete package cannot fit at an acceptable density and with the required protection of

landscape, heritage and habitats, around 500 homes is not a justified capacity assumption. The allocation should be reduced or removed rather than relying on later design work to reconcile an unexplained land budget.

Evidence: Stage 2 Viability Assessment Appendix 3, Table 3n, South Farrington Gurney row, 504 homes and 20.68 hectares; Chapter 4, Figure 4.18 and Policy 4.15; resident measurement and school-land estimate to verify below.

Change or evidence sought: Publish a reconciled allocation boundary and land budget demonstrating how housing, the school, employment space, travel hub, access, drainage, open space and ecological buffers can be accommodated together. Resolve the agricultural land classifications and establish the implications of landscape, heritage, ground conditions, flood risk and the pressure main for developable capacity. Demonstrate an achievable layout and density through proportionate plan-stage evidence. Where the complete package cannot be accommodated acceptably, delete the allocation as presently proposed and reassess its capacity and boundary.

Cumulative Transport Access, Safety and Sustainable Travel

Existing traffic and forecast development trips

Farrington Gurney already carries substantial through traffic because it sits where the A37 and A362 meet. The A37 is also a major route for traffic travelling north from Wells towards Bristol and Bath, as well as for journeys to and from surrounding villages. The draft Farrington Gurney Neighbourhood Plan reports an average of around 15,000 vehicles a day on the A37 in 2024. An earlier council study recorded 15,172 vehicles over a 12-hour weekday period in June 2019 immediately north of the A37/A362 junction. These are different measures and should not be treated as directly comparable, but both show that the village is dealing with heavy traffic before any new allocation is built. The 2019 study also found peak inflows of 1,908 vehicles in the morning and 1,901 in the evening at the junction, and said these appeared to be at or close to the traffic signals' maximum through put.

The Transport Topic Paper, p.100, models 549 dwellings at Farrington Gurney and forecasts 324 morning-peak vehicle trips without the transport strategy and 313 with it, and 292 versus 277 in the evening peak. The modelling therefore forecasts substantial continuing car use. The Council should explain the difference between the 549 dwellings modelled and the policy's around 500 homes, including whether it affects the assessment materially.

The cited peak forecasts imply reductions of 11 AM vehicle trips, approximately 3.4%, and 15 PM vehicle trips, approximately 5.1%, relative to the without-strategy site-trip figures. The limited reduction in forecast site vehicle trips requires a clear explanation of how the residual traffic would be accommodated on the surrounding roads and at the proposed entrances.

Evidence: Transport Topic Paper, p.100, Table 6-6; draft Neighbourhood Plan traffic figure and A37 Options and Feasibility Study, June 2019 survey figures.

Cumulative junction operation and congestion

Farrington Gurney South would not be built in isolation. The draft plan also proposes growth at Midsomer Norton, Radstock, High Littleton, Temple Cloud and Paulton South, alongside other sites in and near the Somer Valley. Vehicles from those developments will use different routes, and it would be wrong to assume that every journey passes through Farrington Gurney. But their combined growth must be considered alongside existing traffic from Wells and other settlements, and the traffic generated by the proposed Farrington site. The council's Transport Topic Paper assesses growth at a strategic level and forecasts additional delay at the A37/A362 junction even with its proposed transport strategy.

This is especially concerning because additional traffic does not have to be a large percentage of total daily flow to cause serious problems at a junction already close to capacity during the busiest hours. Longer queues could delay buses as well as cars, cause queues to interfere with vehicles entering or leaving the new site, make crossing the A362 more difficult, and increase the separation between the proposed development and the existing village. The council's earlier A37 study found that minor changes to the A37/A362 junction would not provide a significant operational benefit; more extensive options required further modelling and, in the case of a roundabout, third-party land.

The Transport Topic Paper, p. 109, forecasts additional delay at the A37/A362 junction under the Local Plan and describes junction or traffic-management measures as something to consider where residual delay or safety issues are identified. Policy 4.15 itself requires safe access from Marsh Lane and the A362, crossings, walking and cycling links, speed-management measures, a travel hub and contributions to bus services (Draft Local Plan, Chapter 4, p. 101). The Council also acknowledges an Air Quality Management Area at the A37/A362 junction (Chapter 4, p. 98, paragraph 4.116).

These documents leave an important question for the examination: what operational and safety outcome is achievable at this particular junction and through the village, after accounting for the allocation and other planned growth? The Council should provide or identify the relevant peak-hour turning movements, queue lengths, delays, junction assessments, pedestrian crossing assessments and air-quality forecasts for its reference and Local Plan scenarios. It should explain the contribution of Farrington Gurney South through a proportionate site-specific assessment, whether by a "plan without this site" model run or another technically sound method.

The answer must address whether queues interfere with either site access, bus reliability or safe crossings; whether proposed measures require land outside the Council's or developer's control; and when those measures must be in place relative to occupation. A general commitment to consider junction works at a later stage would provide limited assurance if the allocation's deliverability depends on them.

Please identify and publish proportionate junction modelling comparing the future reference case and full Local Plan, and explain the individual effect of Policy 4.15 through an otherwise identical scenario excluding it or another technically sound method. Results should show peak turning movements, queues, delays and flows through the village, using consistent assumptions about surrounding development and through traffic.

The Council should identify the proposed turning-lane extensions and any two-lane arrangement near Sunnyside, their land requirements and their modelled operational benefits. It should demonstrate how those proposals would manage queues and access conflicts under cumulative demand.

Evidence: Transport Topic Paper, p.109, Table 6-9; Chapter 4, paragraphs 4.112 and 4.116, Policy 4.15 requirements 11–17 and 26; A37 Options and Feasibility Study.

Safe access under cumulative growth has not been adequately demonstrated

The published evidence does not sufficiently demonstrate that Farrington Gurney South can provide safe access when its traffic is combined with existing movements, background growth and development elsewhere. The concern is the interaction between the proposed entrances, pedestrian and cycle routes, Marsh Lane and the A37/A362 junction—not simply the number of additional vehicles.

Figure 4.18 is expressly illustrative. It does not establish final junction geometry, permitted turning movements, visibility, queue storage or crossing arrangements. Policy requirements for safe access and speed management identify what development must achieve, but do not themselves demonstrate that a workable solution can be delivered at the proposed scale.

This matters because the transport evidence identifies additional delay at the A37/A362 junction. The same report recognises that increased delays on side roads can encourage dangerous manoeuvres onto busy main roads. These findings make it necessary to demonstrate whether queues would obstruct development entrances, restrict visibility or create conflicts between emerging vehicles, through traffic and people walking or cycling. Reference: Transport Topic Paper, p.42 and p.109, Table 6-9.

The modelling forecasts 313 AM-peak and 277 PM-peak vehicle trips with mitigation for its 549-home South Farrington Gurney entry. Those figures require reconciliation with the approximately 500-home allocation. More importantly, aggregate site-trip figures do not show how movements would be divided between individual entrances, how many vehicles would turn in each direction, or whether queues and turning conflicts can be accommodated safely. Reference: Transport Topic Paper, p.100, Table 6-6.

A pedestrian crossing would provide an important safety improvement, but would not by itself resolve conflicts at development entrances or establish safe operation of the surrounding junctions. Its location, visibility and signal operation must be assessed alongside turning movements and queues. The assessment should examine visibility around stationary vehicles and whether crossings follow pedestrian and cycle desire lines.

Although the strategic modelling considers wider growth, the cited evidence does not transparently demonstrate how the access arrangement would operate under that cumulative demand. The necessary demonstration should include entrance-specific turning flows, queue lengths, measured speeds, visibility, pedestrian and cycle movements, school-period demand and interactions with bus stops. It should also test reasonable scenarios in which proposed public transport improvements are delayed or achieve less traffic reduction than expected.

Before relying on the allocation, B&NES should therefore provide an integrated, proportionate assessment of the proposed accesses, Marsh Lane/A37 and A37/A362, supported by independent road-safety review and deliverable mitigation. Detailed construction drawings need not all be completed at plan-making stage, but there must be sufficient evidence that safe arrangements are feasible within the available land and infrastructure constraints.

Until this evidence is provided, there are substantive grounds to question whether Policy 4.15 is justified and effective. Highway safety must be assessed separately from congestion, including the safety of each access arrangement under cumulative traffic demand.

Evidence: Chapter 4, p.99, Figure 4.18 and p.101, Policy 4.15 requirements 12–14; Transport Topic Paper, p.42 and p.109, Table 6-9, and p.100, Table 6-6.

Travel hub bus services and realistic modal change

The Local Plan Modelling Summary Report, p. 93 of the PDF, applies a 20% reduction in perceived walking access and egress cost for model zones within 800 metres of a proposed mobility hub. This is a modelling proxy for the attractiveness of hub facilities. It should not be treated as proof that residents will use particular bus services in the forecast numbers.

Policy 4.15 leaves the hub's detailed specification to master planning or development management, and calls for a proportionate contribution towards improved A37 bus services (Draft Local Plan, Chapter 4, p. 101). The Transport Topic Paper, Appendix B, pp. 124–125, identifies an estimated £750,000 Farrington Gurney travel hub as “critical” and £1.265 million of area-wide active-travel improvements as “essential.” The Council should show how the hub, safe routes to it, service frequency and operating support will be funded, delivered and maintained, and what transport outcomes are expected if service uptake is lower than modelled.

The allocation's transport case should remain robust under reasonable sensitivity tests, including realistic door-to-door journey times and service availability for commuting, shift work and trips outside peak periods.

The Draft IDP describes a Farrington Gurney travel hub with 50 parking spaces, while Policy 4.15(11) expects the hub not to exceed 100 spaces and leaves the detailed specification to master planning. Paragraph 4.117 places it within the site alongside the A37 and A362. The Council should reconcile the hub's specification, land allowance, cost and assumed transport performance across the policy, infrastructure programme and modelling.

If many old and new residents would work in Bath or Bristol, the assessment must reflect complete journeys: travel to the bus stop, the bus route and its stops, and travel from the destination stop to the workplace. It must account for congestion caused by the development itself and test realistic door-to-door travel times for defined destinations and working patterns.

Longer and less reliable journeys could also affect access to work. For residents on lower incomes, shift workers and those with caring responsibilities, the combined time and cost of commuting may make some jobs impractical to retain or accept. The council should assess this risk, the continuing cost of bus provision and the consequences if expected passenger numbers do not materialise.

Ride-sharing should not be assumed to resolve these problems. It depends on people travelling to similar destinations at compatible times and having enough flexibility to share journeys regularly with reliability. 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.

Evidence: Modelling Summary Report, PDF p.93; Transport Topic Paper, Appendix B, pp.124–125; IDP, printed p.30/PDF p.31, Table 7; Chapter 4, pp.98 and 101, paragraph 4.117 and Policy 4.15 requirements 11, 13 and 16.

Community severance and practical access to services

The A362 and its busy junction divide parts of Farrington Gurney. Further traffic could make it harder for residents south of the road to reach the existing village, weakening the connections on which the community depends. The Council should assess actual pedestrian routes to the school, shops, recreation ground and Memorial Hall, including accessibility for children, older residents and people with limited mobility.

Existing houses constrain opportunities to widen parts of the road corridor. The Council should demonstrate which walking and cycling improvements are physically feasible, what land is available and whether the route remains safe through pinch points.

Change or evidence sought: Provide an integrated, proportionate assessment of site accesses, Marsh Lane/A37 and A37/A362 under cumulative demand; identify feasible mitigation, land control, funding and timing; secure necessary works before the occupations that depend on them.

Specific access locations and the limits of the proposed crossings

Figure 4.18 shows three primary-site-access symbols on the A362 and secondary-site-access symbols at Marsh Lane and the A37 frontage. These locations place emerging and turning movements within the same corridor as existing through traffic, queues, bus stops and pedestrian routes. The Council must explain the intended function of each access, the permitted movements and the interaction with the A37/A362 signals.

The proposed turning-lane extension and two-lane arrangement near Sunnyside require operational testing against the full set of accesses. Extra queue storage at one point could change where traffic accumulates or how lanes merge elsewhere. The safety case must show that queues do not block entrances, obscure people crossing, restrict visibility or create pressure for unsafe emerging manoeuvres. Crossing provision must be assessed with its signal timings and any coordination with the existing junction.

The district-wide model still forecasts car-trip growth of 15.5% with mitigation, compared with 17.6% without it, relative to the 2042 reference case. The difference is 2.1 percentage points of growth; substantial growth remains. At Farrington Gurney, Table 5-5 forecasts a 75.3% car mode share before transport mitigation, and the peak site-trip reductions in Table 6-6 remain limited. Those findings reinforce the need to demonstrate local capacity and safety after mitigation.

The transport soundness objection is direct: the cited evidence identifies additional A37/A362 delay and presents illustrative access locations, but does not establish how the final access and

crossing arrangement would safely operate under cumulative growth. Strategic assurance about the network cannot substitute for sufficient local evidence of feasible access, land availability and deliverable mitigation. Policy 4.15 is not adequately justified or effective while those dependencies remain unresolved.

Evidence: Chapter 4, printed p.99 Figure 4.18 and p.101 requirements 11–14; Transport Topic Paper, p.48 Table 5-5, p.92 Table 6-2, p.100 Table 6-6 and p.109 Table 6-9.

Change or evidence sought: Provide an integrated local assessment of the proposed accesses, Marsh Lane/A37 and A37/A362 under cumulative development demand. Reconcile the modelled dwelling numbers with Policy 4.15 and demonstrate feasible turning movements, queue storage, visibility, crossings and safe walking and cycling routes. Test realistic bus and travel-hub performance, including delayed delivery or lower uptake, and identify land requirements, funding, delivery responsibilities and occupation triggers. Unless safe access and necessary mitigation are demonstrated to be achievable, delete Policy 4.15 as presently proposed.

Air Quality and Exposure

Earlier evidence and its limits

The A37 Options and Feasibility Study, drawing on June 2019 traffic surveys, identifies pollution hotspots on the southbound A37 approach to the A362 signals and near the Farrington Inn. It links these to queuing, interrupted traffic flow and nearby vehicle movements. Its traffic model showed persistent southbound queues, with average maximum queues above 100 metres during both peak periods and sometimes exceeding 200 metres, according to the supplied notes.

Evidence: A37 Options and Feasibility Study,; Chapter 4, p.98, paragraph 4.116.

Current cumulative assessment and sensitive receptors

B&NES should provide a current cumulative air-quality assessment covering existing roadside homes, junction hotspots, proposed homes and the proposed school; Farrington Gurney housing, other Somer Valley allocations, the Enterprise Zone and relevant neighbouring development; queuing and stop-start traffic rather than traffic totals alone; NO₂, PM₁₀ and PM_{2.5} with explained vehicle-emissions assumptions; and scenarios in which sustainable transport improvements or cleaner-vehicle uptake occur more slowly than expected.

The HRA also identifies the need for detailed cumulative air-quality assessment and attention to building layout along the A37 and A362 because restricted dispersion could worsen concentrations. The Council should show that any mitigation required for acceptable exposure is feasible within the allocation's layout and delivery programme.

The Council should assess future cumulative exposure at roadside homes, the school and other sensitive receptors alongside the current monitoring evidence. Any AQMA revocation decision should be considered against the development scenarios and mitigation on which the allocation depends.

Evidence: Chapter 4, p.98, paragraph 4.116 and Policy 4.15; HRA, printed p.45/PDF p.45, air-quality discussion.

Change or evidence sought: Publish an updated local cumulative assessment, including queue-sensitive and slower-mitigation scenarios, and secure layout or transport mitigation necessary to protect existing and future sensitive receptors.

Cumulative health effects must inform the allocation decision

The allocation puts additional traffic-generating development beside a corridor already identified for air-quality concern. Longer queues, repeated braking and acceleration, and the position of new buildings and sensitive receptors are material to local exposure. An assessment based on cleaner fleets or successful modal shift must disclose those assumptions and test slower delivery. B&NES must establish that an acceptable layout and mitigation package can be achieved before relying on around 500 homes at this location.

The failure to identify a current local cumulative assessment addressing those conditions undermines the justification for the allocation and its consistency with the plan's health and environmental objectives. An assessment deferred to a planning application leaves the plan without a demonstrated answer to a constraint capable of affecting site capacity, layout and transport requirements.

Change or evidence sought: Publish a current local cumulative air-quality assessment covering existing roadside homes, proposed homes, the school and other sensitive receptors. Assess queuing, stop-start traffic and building-related dispersion, with transparent assumptions for NO₂, PM₁₀ and PM_{2.5} and scenarios involving slower cleaner-vehicle uptake or weaker transport mitigation. Demonstrate that necessary layout and transport measures are feasible, funded and deliverable when required. Unless acceptable exposure can be demonstrated at the proposed scale, delete Policy 4.15 as presently proposed.

Primary, Secondary and Specialist Education

The claimed housing threshold for a new primary school

The Sustainability Appraisal ("SA"), pp. 34–35, says the existing primary school is full and cannot expand, and that there are no safe walking routes to schools in neighbouring villages. It concludes that a new school is needed for development here and states that an additional 500 homes are required to make it viable. This appears to make the school a central reason for choosing the proposed scale, rather than simply a consequence of that choice.

The Council should publish the pupil-yield, school-site, capital-cost, funding and phasing assumptions behind that conclusion. It should test whether a materially smaller allocation, with a credible education solution, would perform better overall against the plan's objectives. If 500 homes are needed solely to finance a school necessitated by this allocation, the Council should explain why that package is preferable to reasonable alternatives elsewhere.

Evidence: SA, pp.34–35, paragraph 2.5.30; Chapter 4, pp.97–101; earlier options material.

Replacement or additional provision and phased pupil demand

B&NES must clarify whether the proposed one-form-entry primary school would replace the existing school or operate alongside it. Using the reported roll of 84 existing pupils and an indicative yield of 155 additional primary pupils from 500 homes gives potential demand for 239 places, compared with 210 places in the proposed school. This calculation is illustrative rather than a forecast: it assumes the new school replaces the existing provision and that existing pupil demand persists. It nevertheless identifies a potential capacity shortfall that requires a clear response.

The additional pupil estimate assumes 31 primary pupils per 100 homes. B&NES should confirm the applicable yield, housing mix, demographic assumptions, and phased demand, together with the intended arrangements for the existing school. It should also reconcile the Sustainability Appraisal's description of that school as full with its reported roll and capacity, explaining the number of usable places and any constraints on admitting additional pupils.

Secondary provision requires an equally specific assessment. Norton Hill is Farrington Gurney's designated catchment school, and its reported oversubscription indicates existing pressure. B&NES should identify where additional pupils would be accommodated and demonstrate the capacity, funding and timing of any necessary expansion.

Any reliance on places in Paulton must account for usable vacancies and demand from Paulton's own housing growth. The cited 472 homes include 80 remaining from existing allocations; the Council should clarify which associated pupils are already included in its forecasts to avoid double counting.

School travel must also form part of the delivery assessment. B&NES should identify safe routes, necessary transport provision and its funding. Eligibility for statutory school transport must be assessed against each pupil's circumstances, the actual route and the nearest suitable school.

Without a coordinated assessment of school capacity, cumulative pupil demand and transport arrangements, the education provision underpinning Policy 4.15 has not been adequately demonstrated to be deliverable.

Evidence: Department for Education, Get Information About Schools — Farrington Gurney C of E Primary School, URN 144281, fields "Number of pupils" and "School capacity", Draft Infrastructure Delivery Plan, printed p.9/PDF p.10, following Table 3. Applying this rate to 500 homes gives 155 pupils, Infrastructure Schedule, PDF p.3, scheme 1.17. It identifies a 210-place school for Farrington Gurney South, estimated at £11,116,733, with phasing of 2028–2038, Sustainability Appraisal,

printed pp.34–36, paragraph 2.5.30, Farrington Gurney discussion, Draft Local Plan, Chapter 4, printed p.100, Policy 4.15 requirements 4–6: a new primary school, education contributions and highway contributions for a non-hazardous walking route to Norton Hill, Norton Hill School's In-Year Admissions page includes Farrington Gurney in its catchment and states that the school is oversubscribed in all year groups, Draft Local Plan, Chapter 1, printed p.25, Policy 1.2: 392 proposed allocations plus 80 remaining existing allocations, Department for Education, Travel to school for children of compulsory school age, May 2026, pp.9–11 on suitable schools and walking distances, and p.15 on unsafe routes. The Draft IDP, printed p.10/PDF p.11, also requires developer contributions where development creates a need for school transport.

Secondary places early years SEND and school travel

The unresolved secondary-school question is where the additional pupils would go and how any necessary provision and transport would be delivered. The Council should provide a cumulative pupil forecast and demonstrate the capacity of the receiving schools.

B&NES should identify receiving secondary schools, forecast places across cumulative housing growth, necessary expansions, land, costs, funding and opening dates. It should also identify early-years and SEND provision, assess safe travel routes and specify the school transport arrangements required.

Evidence: Chapter 4, Policy 4.15 education requirements; SA, pp.34–35.

Change or evidence sought: Provide one coordinated education delivery plan covering existing school arrangements, demand by phase, primary and secondary provision, early years, SEND, school travel and funding. Test smaller housing scales against credible education alternatives.

School costs and unmet secondary demand are central delivery questions

The current infrastructure schedule lists the Farrington Gurney South one-form-entry, 210-place primary school at £11,116,733, funded through Section 106, with a 2028–2038 delivery window. That substantial obligation must be reconciled with the site appraisal, the timing of occupations and the replacement-or-additional-school question. The new school cannot serve as the rationale for choosing 500 homes while its funding, capacity and delivery are left insufficiently coordinated.

Norton Hill's reported oversubscription is a specific existing pressure that requires a forecast response. Using the working secondary yield of 19 pupils per 100 homes gives approximately 95 additional secondary pupils from 500 homes. B&NES should identify where those pupils would be accommodated, the necessary expansions, funding, completion dates and school travel arrangements. A general contribution requirement leaves the receiving-school and delivery questions unanswered.

The Paulton comparison identifies 472 homes, including 80 remaining from existing allocations. Those figures should be reconciled with usable school places and pupils already included in forecasts. The comparison is relevant because neighbouring school places cannot be assumed available where neighbouring housing growth will create its own demand and the SA identifies a lack of safe walking routes between villages.

The education case therefore challenges both justification and effectiveness: the claimed school threshold has not been transparently derived, and the complete education package has not been

demonstrated against cumulative demand. The housing quantum should not be retained on the premise of a school without a coordinated and credible education delivery plan.

Evidence: Infrastructure Schedule, PDF p.3, scheme 1.17; SA pp.34–36, school demand, Norton Hill and Paulton working figures to verify below.

Primary, Secondary and Specialist Education

The claimed housing threshold for a new primary school

The Sustainability Appraisal states that the existing Farrington Gurney primary school is full and cannot expand, that there are no safe walking routes to schools in neighbouring villages, and that 500 homes are required to make a new school viable. This makes school viability an important part of the justification for the proposed scale. However, the passage does not explain how the 500-home threshold was calculated or distinguish the funding needed to build a school from the pupil numbers needed to sustain its operation.

The Council should publish the pupil-yield, school-site, capital-cost, operating and funding assumptions behind this conclusion. It should explain whether 500 homes represent a financial threshold, an educational demand threshold or a combination of both. A school required to accommodate development does not, by itself, establish that the development's scale is appropriate. The Council should demonstrate why this package is preferable to a smaller allocation with a credible education solution or reasonable alternatives elsewhere.

Evidence: Sustainability Appraisal, September 2026, paragraph 2.5.30, printed pp.22–23/PDF pp.35–36; Chapter 4, Policy 4.15, pp.100–101.

Replacement or additional provision and phased pupil demand

B&NES must clarify whether the proposed one-form-entry primary school would replace the existing school or operate alongside it. Using the reported roll of 84 existing pupils and an indicative yield of 31 primary pupils per 100 homes gives 155 additional pupils from 500 homes. Combining these figures produces potential demand for 239 places, compared with 210 places in the proposed school. This is an illustration rather than a forecast: it assumes replacement of the existing provision and continuing demand from its current pupil population.

The Council should confirm the applicable pupil yield, housing mix, demographic assumptions and demand by development phase. It should reconcile the Sustainability Appraisal's description of the existing school as full with its reported roll and capacity, distinguishing nominal capacity from usable places and explaining any admissions constraints.

Evidence: Department for Education, Get Information About Schools, Farrington Gurney C of E Primary School, URN 144281, reported pupil and capacity figures; Draft Infrastructure Delivery Plan, printed p.9/PDF p.10, pupil-yield methodology; Infrastructure Schedule, PDF p.3, scheme 1.17; Chapter 4, p.100, Policy 4.15, requirement 4.

Indicative school costs and delivery do not establish a funded programme

The Infrastructure Schedule identifies a 210-place primary school for Farrington Gurney South, with an indicative cost of £11,116,733 and an indicative delivery period of 2028–2038. These are planning assumptions rather than confirmation that funding is secured or that the school will open at a particular point in the housing programme.

The Council should reconcile the school obligation with the site’s viability appraisal and other infrastructure requirements. It should identify the land-transfer arrangements, funding responsibilities, school-opening programme and enforceable occupation triggers. It must also explain how pupils would be accommodated before the new school opens, including any temporary provision, transport and associated costs.

Evidence: Infrastructure Schedule, PDF p.3, scheme 1.17; Chapter 4, p.100, Policy 4.15, requirements 4–6; Stage 2 Viability Assessment, printed p.85/PDF p.90, paragraphs 3.3.1–3.3.3.

Secondary capacity projections require a local and phased explanation

The Draft Infrastructure Delivery Plan states that no additional secondary provision is currently required across the Somer Valley on its capacity projections, while making that conclusion subject to review. This must be acknowledged. Current oversubscription at an individual school does not, by itself, establish a future area-wide shortage: pupil numbers, admissions patterns and capacity can change.

However, an area-wide projection does not explain where additional Farrington Gurney pupils would obtain suitable places. Norton Hill’s reported oversubscription makes the school-specific assumptions particularly important. The Council should publish the forecast period, receiving schools, available places by year group, demographic assumptions and cumulative housing demand supporting its conclusion. It should distinguish existing capacity from any capacity dependent on expansion.

Using the working assumption of 19 secondary pupils per 100 homes gives approximately 95 additional pupils from 500 homes. This remains illustrative and requires confirmation. Those pupils should be traceable within the forecasts, alongside demand from neighbouring allocations and committed development, without double counting.

Evidence: Draft Infrastructure Delivery Plan, education section, Somer Valley secondary-capacity assessment; Norton Hill School, In-Year Admissions information; Chapter 4, p.100, Policy 4.15, requirements 5–6. The working secondary pupil yield requires confirmation.

SEND reform must be reflected in the allocation’s education assessment

The Council’s announcement of 12 October 2026 confirms Department for Education approval of the Local SEND Reform Plan. It describes stronger mainstream support, additional inclusion bases, recruitment of specialist professionals and existing plans to increase specialist placements. The reform update also proposes locality-based support, including a locality centred on Midsomer Norton.

These reforms are relevant additional provision, but their approval does not establish that sufficient suitable places and support will be available for children arising from the Local Plan's housing growth. B&NES should explain whether its education forecasts incorporate the reforms, their delivery dates and the additional demand from Farrington Gurney and surrounding allocations.

The assessment should distinguish mainstream places, inclusion-base places and specialist provision. It should identify the settings expected to serve Farrington Gurney, the needs they can accommodate, staffing and funding dependencies, accessibility and transport requirements. District-wide provision should not be assumed to resolve local needs without that explanation.

Evidence: B&NES Council, Government approves SEND Reform Plan for B&NES, 12 October 2026; Our plan for SEND: Local SEND reform plan update, sections on Experts at Hand, locality groups and Inclusion Bases; Chapter 4, Policy 4.15, requirement 5.

School access and transport must be deliverable alongside places

The availability of a school place and the ability to reach it safely are separate delivery questions. B&NES should identify safe routes to the proposed primary school and receiving secondary schools, including the required route towards Norton Hill. Where transport is necessary, the assessment should identify eligibility, suitable vehicles, journey arrangements, funding and delivery responsibility. SEND transport requirements should be considered alongside the suitability and location of provision.

Evidence: Chapter 4, p.100, Policy 4.15, requirements 4–6; Draft Infrastructure Delivery Plan, education and school-transport sections; Infrastructure Schedule, scheme 1.17.

Change or evidence sought: Publish one coordinated education delivery plan explaining the calculation behind the claimed 500-home school threshold and whether the proposed primary school replaces or supplements existing provision. Confirm phased pupil demand, usable capacity, receiving secondary schools, early-years and SEND provision, and safe access and transport arrangements. Identify land, capital and operating funding, staffing, opening dates, interim provision and enforceable occupation triggers. Reconcile the area-wide secondary-capacity assessment and SEND reforms with local cumulative demand, and test smaller allocations against credible education alternatives. The Parish Council seeks deletion of Policy 4.15 as presently proposed because a justified scale and deliverable education package have not been demonstrated.

Healthcare, Community Facilities and Utilities

Primary care and dentistry

Chapter 4, paragraphs 4.26–4.27, acknowledges substantial additional healthcare demand while leaving the precise form, scale and location of future provision undetermined. The Draft IDP, p.13, identifies an existing primary-care space deficit and a lack of spare capacity to accommodate additional growth. These findings require a Farrington Gurney-specific delivery response.

B&NES should identify the practices expected to serve Farrington Gurney, existing usable premises and workforce capacity, additional accommodation, capital and operating funding, delivery responsibility and phasing. A contribution towards healthcare does not, by itself, establish that premises or clinicians will be available when homes are occupied. Dental provision should be investigated separately rather than inferred from GP capacity.

Evidence: Chapter 4, paragraphs 4.26–4.27; Draft IDP, printed pp.13–14/PDF pp.14–15.

Community facilities and cohesion

The Council should assess whether existing community facilities can serve the enlarged population and identify any necessary expansion or new provision. The assessment should include Memorial Hall capacity and usage, indoor activities, accessible facilities and the practical connections needed between existing and new residents.

Wastewater treatment and the sewage main

Wastewater: The infrastructure evidence identifies limited capacity at Paulton Water Recycling Centre, which serves Farrington Gurney, and states that no capacity increase is currently planned. The upgrade is nevertheless listed as critical, with its cost to be confirmed. B&NES should demonstrate a feasible, funded solution and appropriate occupation-phasing arrangements. References: Draft Infrastructure Delivery Plan, printed p.42/PDF p.43, Table 10; Infrastructure Schedule, PDF p.13, scheme 4.7.

The pressurised sewage main through the north-eastern part of the site is a separate constraint from treatment capacity. The Council should identify its route, easement, required clearance and any diversion, maintenance or protection works, and show the effects on the layout, costs and delivery timetable.

Water supply and infrastructure timing

The Draft IDP, p.38, records Bristol Water's limited resources to analyse all allocations and its intention to consider infrastructure requirements from 2030 through PR29. The Council should identify the resulting implications for Farrington Gurney, demonstrate feasible supply and any necessary upgrades, and reconcile their timing with the housing trajectory.

The Council should demonstrate a feasible infrastructure solution and a development programme that prevents occupation before essential capacity is available.

Evidence: Draft IDP, pp.14, 38 and printed p.42/PDF p.43, Table 10; Infrastructure Schedule, PDF p.13, scheme 4.7; Chapter 4, p.101, sewage-main constraint.

Change or evidence sought: Identify infrastructure providers, capacity, costs, funding commitments, delivery dates and occupation triggers. Resolve critical dependencies before relying on the allocation's housing trajectory.

Paulton has only around 600 population equivalent of theoretical spare capacity

The current Draft Infrastructure Delivery Plan, printed p.42/PDF p.43, Table 10, states that Paulton Water Recycling Centre serves Paulton, High Littleton, Clutton, Farrington Gurney and Temple Cloud. It records around 600 population equivalent of theoretical additional capacity, excludes unforeseen trade growth, and states that no growth or capacity increase is currently planned. It also identifies flood-risk and odour constraints on expansion and investigation of the works as a frequently spilling overflow. These are express constraints in the Council's own evidence.

The same capacity warning appears in the 2024 Somer Valley Strategic Planning Options report, including the Farrington Gurney options, where it is attributed to Wessex Water. Its inclusion in the current 2026 IDP makes this a continuing planning constraint requiring a delivery solution. The 600 figure is treatment-loading capacity measured in population equivalent, shared across the catchment, not capacity for 600 homes.

For scale, 500 occupied homes would accommodate 1,000 people at an illustrative average of two residents per dwelling, or 1,200 at 2.4 residents. Either is well above 600 people before other catchment development is considered. Population equivalent is a wastewater-loading measure, so these illustrations require conversion using Wessex Water's actual loading and occupancy assumptions. They expose the essential unanswered question: what share of verified treatment capacity is available for Farrington Gurney, and what additional capacity is required before occupation?

Infrastructure Schedule scheme 4.7 lists a Paulton WRC capacity upgrade as critical, with its cost to be confirmed, Wessex Water AMP identified as the funding source, and a broad 2026–2043 phasing window. A critical upgrade identified over the entire plan period, while the IDP states that no capacity increase is currently planned, is not a demonstrated delivery programme. The Council must identify the feasible scheme, added capacity, funding commitment, regulatory approvals and completion date linked to housing occupation.

The wastewater evidence creates a substantive failure of effectiveness in the allocation as presented: the required treatment solution is critical, constrained and uncoded, while the available headroom is limited and shared. Listing an upgrade does not resolve those dependencies. B&NES should not rely on around 500 homes at Farrington Gurney without a coordinated, funded treatment and sewer-network solution and enforceable phasing to prevent growth ahead of capacity.

Evidence: Draft IDP, printed p.42/PDF p.43, Table 10; Infrastructure Schedule, PDF p.13, scheme 4.7; Somer Valley Strategic Planning Options, revised 11 March 2024, pp.126, 132, 138 and 145. Current IDP and schedule entries checked directly on 13 October 2026.

Wastewater capacity, cumulative growth and infrastructure delivery -limited treatment capacity must be assessed against the complete catchment

The Draft Infrastructure Delivery Plan identifies Paulton Water Recycling Centre as serving Paulton, High Littleton, Clutton, Farrington Gurney and Temple Cloud. It records around 600 population equivalent of theoretical additional capacity, excluding unforeseen trade growth, and states that no growth or capacity increase is currently planned. It also identifies flood-risk and odour constraints on expansion and investigation of the works as a frequently spilling overflow.

These are material constraints in the Council's own evidence. The available headroom is shared across the treatment catchment and is measured in wastewater loading, not numbers of homes. It cannot be treated as capacity reserved for Farrington Gurney or as capacity for 600 additional dwellings.

Evidence: Draft Infrastructure Delivery Plan, printed p.42/PDF p.43, Table 10; Somer Valley Strategic Planning Options, revised 11 March 2024, pp.126, 132, 138 and 145.

Combined housing growth requires a coordinated capacity assessment

The Housing Supply Topic Paper trajectory identifies 500 homes at Farrington Gurney South; 392 across the new Paulton allocations; 330 at Clutton; 130 at Temple Cloud; and 45 north of Fox Fields at Hallatrow. Together these amount to **1,397 homes in new allocations**, excluding existing housing commitments, windfalls and employment demand.

This is a provisional comparison of growth across settlements identified as sharing Paulton Water Recycling Centre. It is not confirmation that every proposed development would connect to that works. B&NES and Wessex Water should identify the intended sewer connection and receiving treatment works for each allocation, together with the forecast loading and occupation programme.

The Council must also establish which developments are already included in Wessex Water's capacity assumptions. Existing commitments should neither be omitted nor counted twice. The 1,397-home figure concerns the wastewater enquiry and covers a different geographical grouping from the 1,584 homes used in the employment discussion.

Evidence: Housing Supply Topic Paper, September 2026, housing trajectory, PDF p.30, Somer Valley entries, and PDF p.32, Rural entries; Draft Infrastructure Delivery Plan, printed p.42/PDF p.43, Table 10.

Somer Valley Enterprise Zone has drainage advice, but its cumulative treatment implications remain unclear

Wessex Water's response dated 8 February 2023 to application 23/00076/LDO raised no objection to the Somer Valley Enterprise Zone proposal. It described a proposed connection to the existing 225mm public foul sewer in Langley Lane, southwest of the site, involving works across third-party land.

Its response dated 2 January 2024 confirmed separate drainage arrangements, with foul sewage connecting through a new off-site sewer to the Langley Lane public sewer. Technical design, adoption and connection procedures remained necessary. The response also stated that its advice required review after 18 months or following significant changes, including development numbers or phasing.

These responses show that Wessex Water considered the Enterprise Zone. They do not, on the information identified, establish its receiving treatment works, quantify its wastewater loading or demonstrate treatment capacity alongside the housing growth now proposed. It would therefore be inappropriate to assume either that SVEZ drains to Paulton or that its demand has been omitted from existing calculations.

The January 2024 response is now more than 18 months old. B&NES should identify any subsequent review and demonstrate that current advice addresses the development and phasing now anticipated. The absence of a newer response from the document list examined for the principally highways-related 2025 amendment does not establish that no updated advice exists elsewhere.

Evidence: Wessex Water consultation responses dated 8 February 2023 and 2 January 2024, application 23/00076/LDO; document list examined for amendment application 25/02114/LDO.

A listed upgrade does not establish a funded delivery solution

Infrastructure Schedule scheme 4.7 identifies a Paulton Water Recycling Centre capacity upgrade as critical, with its cost to be confirmed, Wessex Water AMP identified as the funding source and a broad 2026–2043 delivery period. This must be reconciled with the IDP's statement that no capacity increase is currently planned.

The Council should identify the feasible upgrade, additional treatment capacity, funding commitment, regulatory approvals, land requirements and completion date. It should demonstrate how that programme relates to occupation of Farrington Gurney South and other developments using the same infrastructure. A broad delivery window extending across the plan period does not establish that capacity will be available when required.

Treatment capacity and sewer-network capacity must be assessed separately. A technically acceptable sewer connection does not, by itself, demonstrate sufficient downstream treatment capacity. Equally, treatment headroom does not establish that existing sewers and pumping infrastructure can accommodate additional flows without unacceptable consequences.

Evidence: Draft Infrastructure Delivery Plan, printed p.42/PDF p.43, Table 10; Infrastructure Schedule, PDF p.13, scheme 4.7; Wessex Water responses to application 23/00076/LDO.

The pressure main is an additional layout and delivery constraint

Policy 4.15(10) already requires maintenance and repair clearance around the existing rising main crossing the northeast of the site and prevents it running through enclosed private rear gardens. The objection is therefore not that the policy ignores this infrastructure, but that its practical implications have not been transparently reconciled with the proposed capacity.

B&NES should identify the surveyed route, required clearance, protection and access arrangements, and any necessary diversion works. It should demonstrate their effects on housing numbers, roads, drainage, ecological buffers, costs and delivery. Any reliance on diversion should identify feasibility, permissions, funding and timing.

Evidence: Chapter 4, p.101, Policy 4.15, requirement 10; Figure 4.18; site-capacity and viability evidence.

Change or evidence sought: Provide a current, coordinated wastewater assessment identifying the receiving treatment works and forecast loading for each relevant housing and employment development, including SVEZ. Explain which demands are already included in the stated headroom, what capacity remains and when it would be used. Identify necessary sewer and treatment upgrades, their scope, funding, approvals and delivery dates, supported by updated Wessex Water advice. Reconcile the pressure-main constraint with the allocation's layout and capacity, and secure phasing that prevents occupation ahead of essential infrastructure. Unless a feasible and funded solution is demonstrated, delete Policy 4.15 as presently proposed or reassess its capacity and delivery programme.

Healthcare workforce community capacity and sequencing

The IDP's Three Valleys PCN discussion records an existing primary-care space deficit and limited capacity to absorb new patients. The working estimate of five additional GPs for the wider villages must be connected to premises, recruitment, operating funding and delivery dates. Residents' reports of full-capacity warnings and concern about dental access should be evidenced and addressed in that assessment. A workforce estimate without suitable premises and funding leaves the service requirement unresolved.

The Memorial Hall and other shared facilities form part of the village's social infrastructure. Around 500 additional households require a needs and capacity assessment and a specified response for indoor community space, accessible activities and services. Failure to plan for these requirements risks a development connected physically to the village but poorly integrated socially. The healthcare, utility and community deficiencies must be resolved as part of an effective allocation.

Evidence: Draft IDP, printed p.13/PDF p.14, Three Valleys PCN, and printed p.14/PDF p.15 on unresolved estate planning; Infrastructure Schedule, PDF p.3, scheme 1.24, Somer Valley healthcare cost TBC and phasing 2026–2043.

Change or evidence sought: Publish a coordinated delivery assessment for healthcare, community facilities, water supply and wastewater infrastructure. Identify usable capacity, necessary premises and workforce, upgrades, costs, funding, responsible providers and completion dates. Obtain current Wessex Water advice confirming receiving treatment works, committed and additional loading, catchment-wide growth and the treatment and sewer-network capacity required, including relevant employment demand. Reconcile the pressure-main constraint with the site layout and secure occupation limits linked to essential capacity. Unless feasible and funded provision can be demonstrated, delete Policy 4.15 as presently proposed.

Financial Viability, Affordable Housing and Delivery

Funding the complete infrastructure package

The Stage 2 Viability Assessment tests South Farrington Gurney as 504 dwellings on 20.68 hectares. The allocation's effectiveness depends on whether the complete infrastructure package and policy obligations can be delivered within the development appraisal and any secured external funding.

Figure 8, section 2.6.6, presents ward-level new-build sales values without an observed median for Farrington Gurney. The Council should substantiate the local sales-value assumptions used for the strategic appraisal and explain their reliability.

The question is whether the appraisal's allowances match the complete package on which the allocation depends: the new school and its timing; both access points and any off-site junction works; safe crossings and routes, including the secondary-school route; the travel hub; bus-service support; healthcare contributions; ecological buffers and drainage; and any abnormal ground or utilities costs. The Council should provide a transparent reconciliation between the strategic appraisal and the infrastructure delivery programme, identify which costs are included, and test reasonable cost increases and funding gaps. If the necessary package erodes the reported surplus, the Council should explain whether outside funding is secured, whether obligations would be reduced, or whether the development would be delayed or reduced.

The LPVA identifies a more challenging relationship between costs and values in the Somer Valley than in other parts of the district (pp. 78–79). Its assessment of a 30% affordable housing requirement includes Farrington Gurney within the relevant parish boundaries. Section 3.2.27 further warns that higher build costs or Section 106 contributions could put pressure on the ability of schemes in the Somer Valley to deliver affordable housing and meet other obligations (p. 87). Section 3.5.4 says that, although greenfield schemes are generally more viable than those on previously developed land, the Somer Valley's lower values remain an important reason to consider different policy requirements. Section 3.5.5 acknowledges that individual sites may face viability challenges regardless of policy requirements. Taken together, these findings require a

detailed assessment of whether the Farrington Gurney site can fund its complete infrastructure package alongside affordable housing.

Evidence: Stage 2 Viability Assessment, pp.21, 39, 78–79, 85, 87 and 90–91, paragraphs 3.3.1–3.3.3 and 3.2.27; Appendix 3.

Infrastructure funding and realistic sensitivities

The council's Sustainability Appraisal explicitly acknowledges difficulty funding the infrastructure needed for the proposed growth. In the Sustainability Appraisal, paragraph 3.7.2, printed page 47/48, it states: "development contributions and secured investments will struggle to address the full scale of the infrastructure improvements required" This finding concerns the district overall, rather than Somer Valley alone. Nevertheless, it is directly relevant to testing whether the Somer Valley transport package is credible. The same paragraph says transport modelling has been undertaken and the preferred sites have no insurmountable access issues.

The Council should provide a transparent reconciliation between the appraisal and the infrastructure programme, including capital and operating costs where relevant, sources of outside funding, delivery responsibility and inflation or cost sensitivities. It should show how the available funding is apportioned across school, transport, utility and other obligations.

Affordable housing delivery and proportionality

At a 30% requirement, around 500 homes would imply approximately 150 affordable and 350 market homes, subject to the final policy and scheme. B&NES should explain the delivery safeguards and whether the complete infrastructure package is compatible with that requirement. Affordable housing is not synonymous with social-rented housing.

The Council should show why the village's lasting environmental, transport and service impacts are proportionate to the housing benefits and why the selected package is preferable to reasonable alternatives. It should specify how affordable housing obligations would be secured alongside the required infrastructure.

Change or evidence sought: Demonstrate the viability of the complete package with transparent local value assumptions and reasonable sensitivities. Identify how necessary infrastructure and affordable housing would be protected if costs rise, funding is delayed or the reported headroom proves insufficient.

The verified infrastructure off appraisal does not fund the complete package

Stage 2 Viability Assessment, printed p.85, paragraphs 3.3.1–3.3.3, expressly describes Appendix 3 as provisional testing with infrastructure off. Appendix 3 Table 3n, PDF p.15, gives South Farrington Gurney 504 homes on 20.68 hectares. At 30% affordable housing it enters £0 for Section 106 infrastructure, reports an appraisal surplus of £24,291,756, and applies a 25% deduction to give an indicative £18,218,817, or £36,148 per dwelling, for comparison with infrastructure needs. The table separately records £4,837,679 of CIL.

The £36,148 figure is therefore an adjusted indicative amount for comparing infrastructure needs, not evidence that those needs have been costed and funded. The £11,116,733 school

obligation alone is approximately 61% of the £18.22 million adjusted indication, as a scale comparison rather than a completed appraisal. The Council must also reconcile access works, off-site junction improvements, travel-hub and active-travel costs, bus-service support, healthcare, drainage, habitat mitigation and utilities. It must identify which costs sit with the developer, which depend on external funding and how the same contributions would be apportioned.

The omission of Section 106 infrastructure from this strategic testing leaves the decisive viability question unanswered. Until the Council reconciles the complete package with the appraisal and funding programme, it has not demonstrated that the required school, mitigation and affordable housing can be delivered together. This is a material weakness in the effectiveness of Policy 4.15, especially where several infrastructure items are critical or have costs still to be confirmed.

Evidence: Stage 2 Viability Assessment, printed p.85/PDF p.90 paragraphs 3.3.1–3.3.3; Appendix 3 Table 3g, South Farrington Gurney sensitivities, and Table 3n, PDF p.15; Infrastructure Schedule, PDF p.3 scheme 1.17, p.10 schemes 3.70 and 3.73, and p.13 scheme 4.7.

Affordable housing obligations must remain deliverable alongside infrastructure. The original concern about post-permission viability reviews is material because lower local sales values and large infrastructure obligations could put pressure on the affordable provision used to justify the allocation. B&NES should identify the tenure commitments, review mechanisms and safeguards against infrastructure or affordable homes being reduced when costs rise or funding fails. It is also troubling as we were not able to locate a dataset of any B&NES' public consolidated figures showing the affordable homes which have been “promised → revised → delivered” for the district.

Change or evidence sought: Demonstrate the viability of the complete development package by reconciling the infrastructure-off appraisal with all necessary infrastructure, mitigation and affordable-housing obligations. Publish the local sales-value assumptions, cost allowances, contribution apportionment, external funding commitments and reasonable sensitivity tests. Identify safeguards for infrastructure delivery and affordable-housing tenure and provision if costs rise, values fall or funding is delayed. Unless the complete package is shown to be deliverable, delete Policy 4.15 as presently proposed.

Ecology and Habitats Regulations Assessment

Employment use omitted from the screening description

Employment space: Policy 4.15 requires small-scale local employment space, yet the Habitats Regulations Assessment describes the allocation as having no employment use. B&NES must

demonstrate that the assessment covers this element, including relevant traffic, servicing, lighting and disturbance effects. References: Chapter 4, p.100, Policy 4.15, requirement 3; HRA, p.153, Policy 4.15 screening entry.

Inconsistent bat consultation zones

Bat consultation zones: Policy 4.15 identifies Greater Horseshoe Bat Consultation Zone C and Lesser Horseshoe Bat Consultation Zone B. The HRA screening entry instead identifies Greater Horseshoe Zone B and does not identify a Lesser Horseshoe zone. B&NES should reconcile these descriptions and confirm that both relevant species and their habitats have been appropriately assessed. References: Chapter 4, p.103, requirement 24; HRA, p.153.

Habitat buffers and secured mitigation

Habitat buffers: The HRA mitigation table refers to a 35-metre habitat buffer, while Policy 4.15 specifies different buffers for hedgerows, woodland, Marsh Lane Coal Tip and Wellow Brook. B&NES should identify which features the assessed buffers protect and demonstrate that the mitigation supporting its conclusions is secured by the policy. References: HRA, p.40; Chapter 4, p.102, requirements 18–22.

The employment and bat-zone descriptions differ in the published policy and HRA screening entry. B&NES should reconcile those discrepancies, identify the assessment supporting its conclusions, and demonstrate that it covers the complete policy and relevant ecological receptors.

The Council should explain the correspondence between each assessed habitat feature, its required buffer and the policy mechanism securing it. The mitigation supporting the assessment's conclusions must be reflected in the allocation's capacity, layout and delivery requirements.

The woodland and habitat constraints require a site-specific demonstration that the proposed development can be accommodated without undermining ecological connectivity. B&NES's earlier site-options assessment identifies Rush Hill Wood as ancient woodland and Marsh Lane as a Nature Recovery Network opportunity connecting woodland habitats. Policy 4.15 requires minimum buffers of 50 metres to ancient woodland, 20 metres to recent woodland, Marsh Lane Coal Tip SNCI and Wellow Brook SNCI, and at least 10 metres to retained hedgerows, with measurement requirements that may increase the land affected. B&NES should publish a combined constraints plan showing these buffers, habitat connections and dark corridors alongside the housing, school, employment space, travel hub, roads and drainage. The assessment should distinguish land suitable for public access from habitat requiring protection from disturbance, and demonstrate that overlapping uses would not compromise ecological function. Without that spatial demonstration, the policy's protective requirements do not themselves establish that around 500 homes and the associated infrastructure can be accommodated acceptably.

Evidence: B&NES, Farrington Gurney South site-options assessment, updated 1 October 2025, “Farrington Gurney Option 1”; Chapter 4, Policy 4.15, pp.102–104, requirements 18–24 and 30–33.

Change or evidence sought: Correct inconsistent descriptions, identify the relevant ecological evidence, and demonstrate that the complete allocation and effective mitigation have been assessed together. If the assessment depends on changes to the layout, capacity or policy, make and assess those changes before retention of the allocation.

Assessment consistency is part of the justification for the allocation

The employment-use, bat-zone and buffer discrepancies affect the ability to trace the complete policy through its environmental assessment. B&NES must establish which land uses, species, habitat features and mitigation measures supported the assessment’s conclusions. Where ecological requirements reduce developable land or impose additional costs, those consequences must be reflected in the capacity and viability assumptions. An allocation whose policy requirements and assessment descriptions remain unreconciled lacks a clear and consistent evidential justification.

Dark bat corridors, lighting and habitat connectivity

The evidence reviewed does not sufficiently demonstrate that the Farrington Gurney South allocation can preserve continuous, functioning dark routes between bat roosts and feeding habitats. Policy 4.15 recognises the need to protect bat commuting and foraging habitat. However, the HRA’s consultation-zone description, buffer summary and account of proposed land uses differ from the allocation policy. B&NES should reconcile these discrepancies and demonstrate that its conclusions assess the complete development actually proposed.

Evidence: Chapter 4, Policy 4.15, pp.100–104, particularly requirements 3, 18–24 and 30–33; HRA, September 2026, section 5.3.1, pp.38–41, Table 5-1, p.40, and Appendix E, South Farrington Gurney entry, PDF p.153.

Residents report seeing bats along the proposed allocation and moving through the field corridor towards Sunnyside. These observations provide relevant local evidence of bat activity and should inform the ecological assessment. They should be documented through dated sightings, mapped locations and, where available, photographs or recordings. Visual observations alone do not establish the species, the importance of particular routes or their relationship to protected Special Area of Conservation (SAC) populations. Those questions require appropriate surveys.

Evidence: Resident observations of bat activity along the allocation and the field corridor towards Sunnyside, reported in October 2026; dated records and mapped locations to be collated.

Greater and lesser horseshoe bats are the species specifically identified by Policy 4.15 as requiring consideration. Bats using the site and surrounding corridors could be affected by habitat loss, breaks in connecting hedgerows and additional lighting. The Council should establish which species use these routes, their seasonal activity and the importance of the affected habitats before relying on assumptions about protection and mitigation.

Evidence: Chapter 4, p.103, Policy 4.15, requirement 24; HRA, section 5.3.1, pp.38–41.

Artificial light can make a retained hedgerow unsuitable for light-sensitive bats. Stone et al. demonstrated that lighting along lesser horseshoe bat commuting routes substantially reduced activity and delayed commuting. Subsequent research found reduced activity by lesser horseshoe and Myotis bats under LED lighting. Zeale et al. found reduced lesser horseshoe activity under every tested light colour, including red, although bats maintained access to feeding areas by switching to the unlit side of hedgerows. These findings demonstrate both the risk from lighting and the importance of preserving genuinely dark, connected routes. Red or energy-efficient lighting cannot automatically be assumed harmless.

Evidence: Stone, Jones and Harris, 2009, Street Lighting Disturbs Commuting Bats, Current Biology, 19, pp.1123–1127, DOI: 10.1016/j.cub.2009.05.058; Stone, Jones and Harris, 2012, Conserving energy at a cost to biodiversity? Impacts of LED lighting on bats, Global Change Biology, 18, pp.2458–2465, DOI: 10.1111/j.1365-2486.2012.02705.x; Zeale et al., 2018, Experimentally manipulating light spectra reveals the importance of dark corridors for commuting bats, Global Change Biology, 24, pp.5909–5918, DOI: 10.1111/gcb.14462.

The central question is whether an achievable layout can protect darkness and connectivity alongside around 500 homes, employment premises, a school, a travel hub and associated access routes. The Council should demonstrate that corridors remain functional at road entrances, paths and other crossing points. Its assessment should include street lighting, private external lighting and light spilling from windows, together with construction lighting. It must also demonstrate that necessary public-safety lighting can coexist with ecological darkness.

Policy 6.8 requires development to retain or improve the darkness of ecological corridors and protect or provide a functioning dark route for European protected species. A commitment to submit a later lighting strategy identifies work still required; it does not, by itself, establish that the allocation's proposed capacity and layout can meet that requirement.

Evidence: Chapter 4, Policy 4.15, pp.100–104; Chapter 6, Policy 6.8, pp.44–45.

The HRA concludes that adverse effects on SAC integrity are not anticipated, relying on protective policies, surveys and mitigation. The objection is whether sufficient evidence demonstrates that those measures are feasible for this allocation. Government guidance requires appropriate assessment to address habitats outside SAC boundaries where they support protected populations, and to provide findings capable of removing reasonable scientific doubt about effects on site integrity. Detailed designs need not all be completed at allocation stage, but the necessary protection must be demonstrably achievable.

Evidence: HRA, September 2026, section 5.3.1, pp.38–41; Government Planning Practice Guidance, Appropriate assessment, paragraphs 002–003.

Change or evidence sought: Reconcile the policy and HRA descriptions; publish survey-informed mapping of important bat habitats, the reported Sunnyside connection and wider

commuting routes; and demonstrate that continuous dark corridors can be secured throughout construction and occupation. Identify enforceable lighting limits, habitat-establishment requirements, long-term management, monitoring and corrective action. Reflect the necessary protection in the allocation's capacity, layout, costs and delivery programme. Delete Policy 4.15 as presently proposed unless proportionate, consistent evidence demonstrates that the complete allocation can avoid adverse effects on the relevant SACs. If that requires a lower capacity or different boundary, reassess and amend the allocation accordingly.

Wildlife, habitat connections and the effects of additional lighting

The ecological effects of the allocation extend beyond bats. Somerset Wildlife Trust identifies dormice, short-tailed voles, yellowhammers, kestrels, buzzards, wintering snipe and roe deer at Hollow Marsh Meadow, approximately one mile west of Farrington Gurney. It also identifies dingy skipper, small skipper, silver-washed fritillary, small copper, marbled white and meadow brown butterflies, together with beautiful demoiselle damselflies and other waterside insects. These are documented local occurrences, rather than confirmation that each species occupies the allocation. Nevertheless, they establish the need to investigate whether the development land provides feeding, breeding or connecting habitat for wildlife in the surrounding countryside.

Evidence: Somerset Wildlife Trust, Hollow Marsh Meadow, "About the reserve" and location information.

There are also dated local moth records. The Bristol & District Invertebrate Report 2018 records *Coleophora lutarea* at Farrington Gurney on 7 May 2018, including a substantial population in Chewton Wood. Bath Natural History Society reports *Ectoedemia argyropeza* emerging from an aspen leaf collected at Hollow Marsh in autumn 2019. These records demonstrate the importance of particular trees, plants and woodland habitats to local insects, although current surveys are required to establish their distribution and any relationship with the allocation.

Evidence: Bristol & District Invertebrate Report 2018, printed p.61/PDF p.65; Bath Natural History Society, BathNats Moth Group in lockdown, 2020.

Creatures potentially at risk include dormice, farmland birds such as yellowhammers, locally recorded butterflies and moths, small mammals and waterside insects, where they use habitats affected by the allocation. Potential effects include loss of feeding and breeding habitat, fragmentation of hedgerows and woodland connections, disturbance and additional lighting. The Council should establish which of these species actually use the site and its adjoining habitats before relying on mitigation assumptions.

The parish's earlier site assessment identifies Wellow Brook and Marsh Lane Coal Tip Sites of Nature Conservation Interest adjoining FG5, land between Marsh Lane and Hill View. It recognises mature boundary hedgerows and trees as potential components of an ecological network. Its suitability assessment considered development of 20–50 homes focused on the northern portion, leaving residual land for mitigation. That finding does not demonstrate that the

much larger allocation can accommodate development while maintaining the same ecological functions.

Evidence: Salmon Planning Company, Final Site Assessments FG1–FG10, p.10 and pp.58–59.

Dormice require particular attention because of their reported local presence and legal protection. Natural England advises that surveys should be requested where records suggest dormice may be present or proposals affect woodland, hedgerows or scrub. Its guidance identifies habitat fragmentation, removal of connecting hedgerows, lighting, human disturbance and increased domestic-cat predation as potential development impacts. The Council should establish whether the allocation contains suitable dormouse habitat and whether its development would interrupt connections with surrounding populations.

Evidence: Natural England, Hazel dormice: advice for making planning decisions, sections “When to ask for a survey” and “Assess the effect of development on hazel dormice”.

Retaining hedgerows would not, by itself, demonstrate that their ecological value will be maintained. Boyes et al. found 47% fewer moth caterpillars in lit hedgerows and 33% fewer in lit grass margins than at matched unlit sites, with greater impacts under white LED lighting. These figures are not forecasts for Farrington Gurney, but establish a credible mechanism of harm requiring assessment. Similarly, retaining nesting hedges may not protect farmland birds if surrounding feeding habitat is lost. BTO identifies degradation of hedges, field margins and winter food resources as relevant pressures on yellowhammers.

Evidence: Boyes et al., 2021, Street lighting has detrimental impacts on local insect populations, Science Advances, 7, eabi8322, DOI: 10.1126/sciadv.abi8322; BTO, BirdFacts: Yellowhammer, conservation evidence.

The Council should demonstrate that the proposed capacity leaves sufficient space for functioning habitats and connections, including protection from light spill and disturbance. Policy requirements for ecological assessment, buffers and biodiversity gain identify outcomes to be achieved; they do not themselves establish that the complete development package can achieve them.

Change or evidence sought: Reconcile the policy and HRA descriptions of employment use, bat consultation zones and habitat buffers, and demonstrate that the complete allocation has been assessed. Publish a current species-record search and proportionate seasonal survey evidence identifying wildlife, habitats and connections within the allocation and adjoining land, including the reported Sunnyside bat route. Demonstrate that dark corridors, feeding areas, breeding habitats, watercourses and movement routes would remain functional throughout construction and occupation, taking cumulative effects into account. Secure enforceable lighting controls, long-term habitat management, monitoring and corrective action, and reflect these requirements in the allocation’s capacity, layout, costs and delivery programme. Unless effective ecological protection and the HRA conclusions are adequately supported, delete Policy 4.15 as presently proposed. Any revised capacity or boundary must be reassessed against these requirements.

Evidence: Chapter 4, Policy 4.15, pp.102–104, requirements 18–24 and 30–33; Chapter 6, Policy 6.8, pp.44–45.

Consultation and Access to Evidence

Late publication of the site assessment spreadsheet

The site assessment spreadsheet was published on 9 October 2026. The Council has provided a separate six-week opportunity for supplementary comments on that spreadsheet and consequential implications for the plan, closing at 5pm on 20 November. The main Regulation 19 consultation closes on 30 October. The relevant Farrington Gurney assessment and any consequential representations must be included in the examination evidence.

Where the late evidence materially affects the Farrington Gurney assessment, the representation should identify the affected rows and conclusions and explain the implications for the allocation's soundness and the opportunity for informed participation.

Boundary engagement and representation accuracy

Paragraph 1.6 of the Settlement Boundary Review Topic Paper states that parish and town councils were invited to comment on draft boundaries. For Farrington Gurney, the Council should identify the boundary version circulated, dates, recipients, responses and subsequent changes, and demonstrate how engagement informed the published allocation.

Evidence: Official Regulation 19 consultation portal and 9 October update, accessed 13 October 2026; Settlement Boundary Review Topic Paper, paragraph 1.6; consultation reports.

Change or evidence sought: Ensure that the examination receives the complete site evidence, consequential representations and a transparent record of engagement and responses.

Late evidence and substantial changes require meaningful scrutiny

The objection concerns whether the published allocation and spatial strategy have received informed scrutiny against the evidence now relied upon. The late spreadsheet, changes to development boundaries and introduction or revision of substantial sites must be accompanied by a transparent account of their assessment, reasonable alternatives and engagement. The Council should demonstrate that consultation responses have informed the strategy and that consequential evidence can be considered before the plan is submitted.

Other councils have identified Paulton boundary changes, Hallatrow and Farmborough sites, the Mendip Close HELAA issue, and concerns about the accuracy of Paulton and Radstock consultation summaries. Those matters require their records, but they remain relevant to the wider challenge where they reveal an inconsistent site-selection method or cumulative-growth assessment affecting Farrington Gurney. They should be investigated in the argument's evidential context rather than discarded as unrelated village concerns.

A strategy materially altered to meet the housing requirement must still be justified by proportionate evidence and assessment of reasonable alternatives. Unresolved site selection and

engagement discrepancies weaken that justification. The representation seeks a complete and transparent evidence base and a substantive response to the Farrington Gurney objections, including any modifications required to make the allocation sound.

Change or evidence sought: Ensure that the examination receives the complete site-assessment evidence and all consequential representations submitted through the supplementary consultation. Publish a transparent record of boundary engagement, site-selection decisions, reasonable alternatives and responses to the Farrington Gurney objections. Explain and address any material discrepancies affecting the allocation's assessment or the opportunity for informed participation, and undertake any further consultation required by consequential changes before relying on them.

Overall Case and Requested Modifications

The objections are cumulative. The proposed scale is linked to a new school; the school, transport measures, utility capacity and other obligations require land, funding and coordinated delivery; and the transport and ecological assessments must cover the complete allocation. These dependencies should be tested together rather than answered through unrelated promises of later assessment.

The evidence presented supports an objection that Policy 4.15 is unsound as drafted: insufficiently justified in its scale and location, ineffective where critical infrastructure lacks a demonstrated delivery solution, and inadequately evidenced against safe-access and sustainable-development requirements. These are connected deficiencies in the allocation's planning case, not a collection of minor design requests.

The requested modification is deletion of Policy 4.15. The Council should reassess the housing distribution and reasonable smaller alternatives through a complete comparison of transport, education, wastewater, healthcare, land capacity and environmental effects. Any allocation subsequently proposed must secure infrastructure and mitigation at the point they are needed, with clear funding, delivery responsibility and occupation limits. Essential constraints should not be passed to future applicants while the plan counts the housing as deliverable.