

Bath & North East Somerset Council		
MEETING	Cabinet	
MEETING	25 th September 2025	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3636
TITLE:	Reset Local Plan Options document	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report: Attachment 1: Reset Local Plan Options document Attachment 2: Reset Local Plan Options communications and engagement plan Attachment 3: Equalities Impact Assessment of Reset Local Plan Options		

1 THE ISSUE

- 1.1 In 2024 government issued significant changes to national planning policy and a revised standard method figure of housing need. The revised housing need figure for Bath & North East Somerset is more than double that of the previous government. As a result the council decided in 2024 to reset preparation of its Local Plan in order to consider the implications of changed policy and to enable progression towards a sound Local Plan. Resetting the Local Plan requires the council to prepare and consult on a further set of options for meeting the substantially increased level of housing need, associated job growth and some new policy approaches. This report seeks approval of a reset Local Plan options document for consultation commencing in October this year.

2 RECOMMENDATION

The Cabinet is asked to;

- 2.1 approve the Reset Local Plan Options document (Attachment 1) for public consultation for a period of six weeks from 3rd October to 14th November 2025**
- 2.2 agree and authorise the Executive Director for Sustainable Communities, in consultation with the Cabinet Members for Built Environment, Housing and Sustainable Development and Communications and Community, to issue communications relating to the reset Local Plan Options and to undertake consultation as summarised in section 10 of this report and outlined in the communications and engagement plan (Attachment 2)**
- 2.3 delegate authority to the Executive Director for Sustainable Communities, in consultation with the Cabinet Member for Built Environment, Housing and Sustainable Development, to agree textual changes to the Options document (Attachment 1) prior to its publication for consultation**

3 THE REPORT

Local Plan 2025-2043

- 3.1 The preparation of a Local Plan is a key means of shaping the future of places within Bath and North East Somerset (B&NES) primarily by facilitating the delivery of high-quality development in a planned and co-ordinated way that will help the council meet its priorities e.g. providing the right homes in the right places and specifically more affordable housing, moving towards zero carbon and addressing the ecological emergency. It also enables delivery of development to be aligned with infrastructure provision that can be funded or part funded by developer contributions as well as investment from the West of England Mayoral Combined Authority (MCA).
- 3.2 Development of housing that is more affordable, as well as additional economic space is crucial in improving people's lives and maintaining sustainable economic prosperity. Substantial investment in infrastructure, including transport, is necessary to unlock and support delivery of this development. The Local Plan is central to achieving this, as well as ensuring that change and development helps us to address the climate emergency, is resilient and adapts to climate change and facilitates nature recovery. The spatial priorities that underpin the Local Plan reflect these key objectives (see para 3.15 below).
- 3.3 The council publicised its intention to prepare a new Local Plan by publishing the Local Plan 2022-2042 Launch Document in November 2022. The Launch Document outlined the proposed plan period (twenty years to 2042); scope of the Local Plan; and the arrangements for preparing it. This was followed by preparation of and consultation on a Local Plan Options document in spring 2024. The Options document outlined both policy approach and development location options for accommodating the then assessed need for additional homes and jobs. Following consultation on the Options document the council then intended to prepare a Draft Local Plan, setting out its proposed policies and site allocations, for formal consultation under Reg 19 (of The Town and Country Planning (Local Planning) (England) Regulations 2012) prior to it being submitted for Examination.
- 3.4 In December 2024 government issued significant changes to national policy and practice guidance and a revised standard method figure of housing need. The key changes to national policy include:

- Increased expectation that Local Plans will plan for a level of housing that meets the government's standard method figure of housing need and re-instatement of the need to demonstrate a five-year housing land supply
- Standard method figure of housing need increased nationally and more than doubled for B&NES – from around 720 per annum under the previous government to around 1,500 per annum
- Requirement that council's review their Green Belt if housing need cannot be met in any other way and introduction of the concept of 'grey belt' to help ensure the strategic release of land for development
- Introduction of 'golden rules' relating to the development of land released from the Green Belt requiring increased affordable housing provision; necessary improvements to local or national infrastructure; and provision of improved or new accessible green space
- Increased focus on delivering economic growth, including in specific sectors
- Greater focus on addressing the affordability of housing and specifically meeting the needs of those on lower incomes
- Commitment to regional/strategic planning and emphasis on its role in delivering the housing and economic growth needed

3.5 The changes to the National Planning Policy Framework (NPPF) and revised standard method figure of housing need have very significant implications for B&NES. As a result of these changes (trailed in consultation by the government in summer 2024) the council's Cabinet resolved in September last year to reset preparation of the Local Plan in order to ensure that it reflects revised national policy, to undertake further necessary evidence work, assess options for additional development and to enable a sound Local Plan to be prepared.

3.6 Resetting preparation of the Local Plan means that consultation on a further set of Options is necessary before progressing towards a Draft Local Plan. The council is required to test and consult on all 'reasonable alternatives' to meet the increased level of housing need.

3.7 As a result of government changes to the NPPF and the standard method figure of housing need Local Plan preparation and adoption has been delayed by around twelve months. The amended programme for Local Plan preparation has been agreed under delegated authority by the Executive Director for Sustainable Communities, in consultation with the Cabinet Member for Built Environment, Housing and Sustainable Development and is set out in the council's published [Local Development Scheme](#). In summary it is now as follows:

- Subject to approval by Cabinet as recommended in this Report, Reset Local Plan Options consultation: October/November 2026
- Preparation and consultation on the Draft Local Plan: spring/summer 2026
- Submission of the Local Plan for Examination: autumn 2026

- Examination hearings and receipt of Inspector's Report: winter 2026 – summer 2027
 - Adoption of the Local Plan by council: summer 2027
- 3.8 The NPPF requires that a Local Plan should cover a plan period of at least fifteen years from the anticipated date of adoption. As a result of the delays in preparation the plan-period will now be from April 2025 to April 2043. The NPPF also requires that a council's Development Plan (primarily the Local Plan) must include strategic policies to address its priorities for the development and use of land in its area. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development; infrastructure; community facilities; and the conservation and enhancement of the natural, built and historic environment. Non-strategic policies should be used to set out more detailed policies for specific areas, neighbourhoods or types of development.
- 3.9 As referenced above the government has set out its commitment to strategic planning at a regional level, especially in areas where powers have been devolved to a Mayoral Combined Authority (MCA). Such authorities (including the West of England MCA) are required to prepare a Spatial Development Strategy (SDS) covering their area. Local Plans need to be in general conformity with an adopted SDS.
- 3.10 In 2021 the West of England Combined Authority Mayor halted work on the Mayoral SDS. As a result, the B&NES Local Plan (and the Local Plans of the other two MCA constituent local authorities i.e. Bristol City Council and South Gloucestershire Council) will address the strategic issues that would have been addressed by the SDS. The three UAs have worked and continue to work closely together on our respective Local Plans. Through the Duty to Co-operate we are required to engage constructively and on an on-going basis on strategic cross boundary matters. In accordance with the Duty to Co-operate B&NES is engaging not only with Bristol City Council and South Gloucestershire Council, but with our other neighbouring authorities of North Somerset, Somerset and Wiltshire Councils.
- 3.11 The B&NES Local Plan 2025-2043 will therefore cover all strategic and non-strategic policies relating to the development and use of land across the district. Upon its adoption it will replace the B&NES Core Strategy, Placemaking Plan and Local Plan Partial Update (LPPU).
- 3.12 Given the government's requirement for MCAs to prepare a SDS the West of England MCA has recently confirmed that it will re-commence work on the SDS. Further details on the scope of the SDS and programme for its preparation are awaited. The development strategy, site allocations and policies in the B&NES Local Plan 2025-2043 (as well as the other constituent UAs Local Plans) will contribute to the SDS. Local Plans are required to be reviewed at least every five years. Therefore, following adoption of the SDS it is likely that the B&NES Local Plan 2025-2043 will be reviewed.
- 3.13 In response to the government's ambition to secure sustained economic growth and increased productivity the MCA is also required to prepare a Local Growth Strategy. The Local Growth Strategy is currently being prepared and is intended

to provide the broad strategic direction for other relevant strategies and plans including the SDS. The Local Growth Strategy will outline how the MCA will help to drive growth in the region, building on the area's unique strengths and opportunities to support key growth-driving sectors. B&NES Council (along with the other constituent local authorities) is working in partnership with the MCA to ensure the Local Growth Strategy reflects this council's priorities and objectives for the local economy. The emerging Local Growth Strategy will also form an important part of the context for the B&NES Local Plan 2025-2043 and our planning policy framework and site opportunities will need to help deliver sustainable economic growth.

- 3.14 In addition to working with the MCA on the Local Growth Strategy and the SDS (once work re-commences) the council is also focussing on ensuring MCA infrastructure funding and investment will help to unlock and support delivery of development within B&NES.
- 3.15 As set out above the B&NES Local Plan 2025-2043 is an important mechanism in shaping the future of our places and delivering the council's priorities primarily through facilitating high-quality and sustainable planned development.
- 3.16 In the spring 2024 options document the council outlined the spatial priorities for the Local Plan. These spatial priorities will underpin and be delivered through the spatial strategy, policy framework and site allocations. The spatial priorities are proposed to remain the same and are as follows:

Our Local Plan will plan for development in response to local needs to create attractive, healthy and sustainable places in line with the council's Corporate Strategy.

The Plan will:

- *Maximise the delivery of housing that is more **affordable***
- *Create a **fairer, more prosperous and sustainable** economy*

In doing so, our plans for development must:

- *Enable B&NES to become **carbon neutral by 2030** and deliver a climate resilient district*
- *Protect and enhance nature through facilitating **nature recovery***
- *Improve **health and well-being** outcomes for all, including through planning health promoting and inclusive places and providing for cultural enrichment*
- *Reduce the need to travel unsustainably and enable **improved connectivity** for all through sustainable modes of transport and facilitating locally available services and facilities*
- *Respect, conserve and enhance our **heritage assets** and their landscape settings, in particular the World Heritage Site of Bath and National Landscapes*
- *Align the timely provision of **transport, health, education, social, cultural and green infrastructure** with development*

- 3.17 As set out in paras 3.1 and 3.2 above the council is committed to planning for the delivery of additional housing, especially affordable housing, in the right places, as well as more economic space to facilitate sustainable economic prosperity. The scale of growth set by the government through the revised standard method housing need figure of around 1,500 homes per annum is likely to be very

challenging to deliver. Options are outlined in the Reset Local Plan Options document to achieve this. However, it should be noted that the cumulative impacts of the options and this level of development have not yet been assessed. This testing will be undertaken in working towards the Draft Local Plan.

- 3.18 Evidence work that will be published alongside the Reset Options document shows that the need for affordable housing is significant (around 50% of total housing need) and that the government's increased figure of housing need requires a greater amount of job growth in order to maintain a balance between homes and jobs within B&NES (estimated to be around 25,000 additional jobs during the Local Plan period).
- 3.19 Given the increased levels of housing and employment space to be planned for a range of options for additional development have been considered and are outlined in the Local Plan Reset Options document. The previous options that were subject to consultation in spring last year remain valid and are presented in the Reset Options document alongside new or extended options to accommodate the greater level of growth. This ensures that a comprehensive picture of options in places across the district is presented. Comments submitted in response to the spring 2024 consultation also remain valid and will continue to be carefully considered by the council in preparing the Draft Local Plan.
- 3.20 Within the context of the spatial priorities of the Local Plan and in particular the need to minimise carbon impacts arising from new development the approach to assessing and identifying options for development remains broadly the same as undertaken in 2024. This means focussing development options on sub-areas or places within the district which are, or can be, comparatively well connected to jobs, services and facilities through sustainable means of transport. Strategic growth options therefore continue to be focussed at Bath; within the Bath to Bristol corridor; and the Somer Valley. These areas are also those proposed to be the focus for economic growth through the emerging MCA Local Growth Strategy. In addition, options are presented for some local or non-strategic development in some the comparatively more sustainable villages.
- 3.21 As the main economic centre in the district and where a substantial proportion of the need for affordable housing is derived it is crucial that an appropriate level of growth is focussed at Bath. A central element of the proposed strategy is optimising the capacity of brownfield sites within the city both for additional housing and employment space. However, in order to sustainably deliver development required to meet the government's standard method figure of housing need the council considers that growth of the city needs to be considered. As such options for development primarily on the western edge of Bath are presented for consultation. As Bath is a double inscribed World Heritage Site (WHS) this makes planning and delivering strategic growth very difficult given the WHS inscription itself and associated attributes. Assessment shows that such development would give rise to substantial harm to the WHS and would be contrary to national policy. The council remains in dialogue with government on this issue and is keen to demonstrate that Bath can be an exemplar for sustainable development which protects and enhances the city's heritage.
- 3.22 Options for strategic and non-strategic development are set out in other parts of the district as summarised above. The main focus of development is proposed to be on strategic sites as development at a larger scale is more capable of being supported by and delivering necessary infrastructure improvements and achieving

the council's priorities. As set out above investment in supporting infrastructure, especially transport, is a pre-requisite for and will unlock development.

3.23 Whilst the main focus is proposed to be on strategic sites it should be noted that to maintain a five-year housing land supply a diverse supply of sites will be needed. This will include some smaller, non-strategic sites which are capable of delivering housing more quickly. In addition, some development in villages is necessary in order to help maintain vibrant villages, population levels and local services and facilities.

3.24 The development options outlined in the Local Plan Reset Options document are not solely focussed on housing and also include options for commercial/employment uses, necessary to help maintain or create more balanced communities and to help deliver job growth.

3.25 In addition to place-based site options to deliver growth the council is also presenting a limited range of new Development Management policy approach options. Development Management policies apply district-wide and are used in the determination of planning applications. The government is proposing to introduce a set of National Development Management Policies (NDMPs). However, there remains uncertainty as to the scope, coverage and status of the NDMPs, as well as the timing of their introduction. Therefore, at this stage it is proposed the B&NES Local Plan 2024-2043 will include a full suite of Development Management policies, but this will be kept under review as we progress towards the Draft Local Plan.

3.26 A broad range of Development Management policy approach options were consulted on in spring 2024. These options are not presented again in the Reset Options document and the comments submitted in response to the 2024 consultation are still valid and continue to be carefully considered by the council in preparing the draft Local Plan. In this Local Plan Reset Options document only policy approach options are presented either for new policy areas or where new/revised approach options are required as a result of revisions to national policy or other changed circumstances such as new or updated evidence. In summary these are options relating to:

- Affordable housing (updated text)
- Co-living accommodation
- Houses in Multiple Occupation
- Purpose Built Student Accommodation
- Gypsies and Travellers Accommodation
- Housing Development Boundaries review
- Climate change: adaptation & resilience, retrofit first and District Heating
- Renewable energy
- Low impact farming
- Green Belt
- Protection of industrial sites
- Local Green Spaces
- Somersetshire Coal Canal
- Waste

4 STATUTORY CONSIDERATIONS

- 4.1 Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004, Section 70(2) Town and Country Planning Act 1990).
- 4.2 Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004 sets out that each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents (taken as a whole). The development plan for an area is made up of the combination of strategic policies (which address the priorities for an area) and non-strategic policies (which deal with more detailed matters).
- 4.3 In light of the UK Plan-led system, Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires that Local Planning Authorities must review local plans and the NPPF states that this must take place at least once every 5 years, and Plans should then be updated as necessary. This must in whole or in part be to ensure that policies remain relevant and effectively address the needs of the local community.
- 4.4 The council updated parts of its Local Plan (comprising the Adopted Core Strategy and Placemaking Plan) through the LPPU. The LPPU was adopted in January 2023. However, a full update of the Local Plan now needs to be prepared in order to ensure that the needs for development within the district (e.g. for housing and employment space) over the longer term can be objectively assessed and responded to positively. Work commenced on the full update of the Local Plan and an Options consultation took place earlier this year. The revised NPPF and standard method figure of housing need required the Local Plan to be re-set and further engagement on reasonable alternatives or options to be undertaken.
- 4.5 The Levelling Up and Regeneration Act (2023) received Royal Assent on 26 October 2023 which will make some changes to plan-making. Regulations by the Secretary of State are required to bring these changes into force. The previous Government said local planning authorities (LPAs) must submit their local plans for examination by 30 June 2025 (and adopt them by 31 December 2026) if they want their local plans to be adopted under the current system. Under the revised NPPF the submission deadline has been extended to December 2026 to enable local authorities to undertake significant further work on their Local Plans. If LPAs are not able to meet these deadlines (or if their local plans fail at examination), then LPAs must prepare their local plans under the new plan-making system details of which are still emerging from government. The council's Local Plan is being prepared under the current system and as set out above it is anticipated it will be submitted before the December 2026 deadline.
- 4.6 The first formal stage in preparing the council's new Local Plan is Regulation 18 of Town and Country (Local Planning)(England) Regulations 2012/767 which provides the opportunity to gather evidence and test options with local communities and stakeholders. Following consultation on the Options document last year further options engagement and consultation under Regulation 18 needs to be undertaken in respect of the re-set Local Plan.
- 4.7 The Planning and Compulsory Purchase Act 2004 requires all local planning authorities to prepare a Local Development Scheme (LDS). The LDS sets out the

programme, resources and arrangements for the production and review of statutory planning documents required by the council. The LDS must be kept up to date. The current version of the LDS is up-to date and is published on the council's [website](#).

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 The Local Plan has been and continues to be prepared utilising existing staff resources, led by the Planning Policy team and involving various other teams across the council, as well both council and MCA funding (see 5.2 below). Preparing a Local Plan requires significant resources. With regards to this Local Plan the need to reset it in light of the government's revisions to national policy and the standard method figure of housing need means substantial additional work needs to be undertaken. In recognition of this additional work central government made two funding grants available for application i.e. Green Belt review funding and Local Plans Delivery funding. This council applied for and received funding from both pots, and these are being used to help cover the cost of preparing the Local Plan.

As identified above the costs of preparing this Local Plan are covered by government grants, council and MCA funding. Council funding has been primarily from the existing Local Development Framework (LDF) budget. The council also successfully bid for strategic masterplanning funding from the MCA and this has been and will be utilised in preparing the Reset Local Plan. Given the magnitude of the costs of preparing a Local Plan the funding identified above is not sufficient to cover the full costs. Therefore, a facility to draw down a total of up to £850,000 from the council's central reserves during the financial years 2025/26 and 2026/27 has been agreed. It is anticipated that drawing down the agreed £850,000 from central reserves will be sufficient to enable the Local Plan to be progressed to adoption.

6 RISK MANAGEMENT

- 6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the council's decision-making risk management guidance.

7 EQUALITIES

- 7.1 Preparation of the Local Plan to date, including the Reset Options document has been subject to an Equalities Impact Assessment (EqIA) which ensures that the council understands the implications for people with protected characteristics of each of the options presented for consultation (see Attachment 3). The impacts recorded through the EqIA will be taken into account in the next stages of plan-making. An EqIA of the Draft Local Plan will also be undertaken at the relevant time. The Local Plan is also subject to a Sustainability Appraisal (statutory requirement) throughout its preparation that also considers, at a more general level, equalities issues.

8 CLIMATE CHANGE

- 8.1 Helping to address the climate and ecological emergencies through contributing to becoming zero carbon by 2030 e.g. reducing carbon emissions arising from new

development; and facilitating nature recovery are key spatial priorities of the Local Plan. Policy approaches or options set out in the document specifically aimed at meeting these priorities were set out previously in the Options document published earlier this year for consultation and also in this Reset Options document. The reset Local Plan will continue to be underpinned by addressing the climate and ecological emergencies, including through:

- Locating new development where it is best served by sustainable modes of travel and minimises car travel
- Policy approaches to minimise energy use or carbon emission rates in new development and ensure they are, as a minimum, zero carbon
- Options to help further reduce embodied carbon from all scales of development
- Options to ensure that future development is resilient to and adaptable to the impacts of climate change.
- Setting out policies that are aimed at better enabling the delivery of renewable energy installations in the most appropriate locations
- Looking at how to increase Biodiversity Net Gain in new development and working with the Local Nature Recovery Strategy to maximise nature recovery opportunities/benefits

9 OTHER OPTIONS CONSIDERED

- 9.1 In progressing the Local Plan, the other option which was considered was accelerating preparation of the Local Plan in order that the transitional arrangements published by the government alongside the revised NPPF could be met. However, it was concluded that this would be impossible in a way that ensured the Local Plan would have been found sound at examination. Therefore, progressing the reset Local Plan to the programme set out in the LDS (and summarised in para 3.7 of this report) is the only appropriate course of action.

10 CONSULTATION

- 10.1 In preparing this Report the Cabinet Member for Built Environment, Housing and Sustainable Development, the Executive Director for Sustainable Development, the S151 Officer and Monitoring Officer have been consulted. It has been cleared for publication by the S151 and Monitoring Officer.
- 10.2 As part of preparing the Local Plan Reset Options document the council has engaged with residents and other stakeholders in explaining what a Local Plan is, the implications of the revised NPPF and increased figure of housing need, the need to reset the Local Plan, test and consult on additional options and the next steps. The aim of this engagement prior to consultation on the Local Plan Reset Options document has been to increase understanding of local plan-making and to raise awareness of the issues to be addressed. It is hoped that this will help to increase the reach of consultation and engagement moving forward.
- 10.3 Broadening the reach of engagement and consultation on the Local Plan is crucial. In particular, the council is seeking to better involve younger people and families including those that don't own their own home. Engagement and consultation will also target seldom heard groups and ensure equality of

opportunity to comment. In broadening engagement, the council is using innovative methods and has set a target of engaging 10% of the population in the preparation of the Local Plan.

10.4 Consultation on the Local Plan Reset options document will take place between 3rd October and 14th November. Consultation will be undertaken in accordance with the council's published Statement of Community Involvement, and a range of innovative engagement/consultation methods will be used. These are set out in more detail in the Communications and Engagement Plan (Attachment 2) and include:

- New tailored and user-friendly Local Plan web platform
- In-person consultation events/exhibitions and on-line briefings
- Roadshow going to various places across B&NES
- Meetings with community representatives, including parish & town councils, stakeholders and ward councillors
- Meetings and workshops with other stakeholders, including landowners and developers and Duty to Co-operate prescribed bodies
- Tailored engagement with a number of seldom heard groups/networks
- Publication of documents for consultation and comment including via the web platform above

10.5 The council will clearly communicate consultation on the Reset Local Plan Options document and is also aligning it with other relevant consultations, including the Movement Strategy for Bath and the Somer Valley Draft Design Guidance Supplementary Planning Document.

10.6 Following consultation stakeholder engagement will continue in both preparing the Draft Local Plan and through formal consultation on the Draft Local Plan under Regulation 19. The programme for the next stages of Local Plan preparation is set out in the Local Development Scheme which will be updated as necessary.

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Background papers	Local Plan 2022-2042 Options document (February 2024): https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf
Please contact the report author if you need to access this report in an alternative format	