

Equality Impact Assessment / Equality Analysis

(Updated September 2025)

Item name	Details
Title of service or policy	Bath and North East Somerset Council Local Plan 2025-2043 Options Consultation (Regulation 18)
Name of directorate and service	Planning Policy
Name and role of officers completing the EIA	Charlotte Clark, Apprentice Planning Officer and Richard Daone, Deputy Head of Planning (Policy)
Date of assessment	September 2025

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
1.1 Briefly describe purpose of the service/policy e.g. • How the service/policy is delivered and by whom • If responsibility for its implementation is shared with other departments or organisations • Intended outcomes	Bath and North East Somerset Council's (B&NES) Development Plan, otherwise known as the Local Plan, currently comprises the Core Strategy, Placemaking Plan and the Local Plan Partial Update. Work has started on updating the Council's Local Plan. The new Local Plan will establish the planning framework for managing growth and change in the district until 2043. It will identify potential sites for development, as well as set out a vision, strategy and policies to guide and manage planning decisions. Once adopted, it will be the main tool used to determine planning applications. The Local Plan will align with other Council strategies and plans such as the Economic Strategy, Housing Plan, transport plans and the Council's aim to be carbon neutral and nature positive by 2030. It will also play a crucial role in delivering the Council's corporate priorities, including improving people's lives, tackling the climate and ecological emergencies and preparing for the future in terms of the economy, responding to housing need and addressing inequalities. A Launch Document was published for consultation in Autumn 2022. This marked the formal start of the preparation of the Local Plan. B&NES completed a period of consultation on a first Local Plan Options Document (Spring 2024). However, as a result of proposed government revisions to the National Planning Policy Framework and standard method housing figures in 2024, the Council decided to reset the new Local Plan. This is outlined in the Local Plan Reset Document.

This decision was made to enable further consideration of options to accommodate for the additional development now required.

Given the new timetable for the preparation of the new Local Plan, a new Local Plan period has been set for 2025-2043.

This EqlA relates to the **Options Draft** (Regulation 18) of the new **Local Plan 2025-2043**, which outlines the overall vision and issues for the new Local Plan. It sets out a range of options for dealing with issues which the plan needs to address.

There is ongoing engagement and communication on the new Local Plan as it progresses through its different stages until final adoption. The Engagement and Communication Strategy for the new Local Plan is being updated and a new approach is proposed. It will be informed by the previous [Engagement and Communication Strategy](#). This document sets out the opportunities for communities and stakeholders, including seldom-heard groups to be involved in the preparation of the Plan. This is being delivered by the Planning Policy Team with assistance from other services within the Council, including the Regeneration Team. The overall intended outcome of the strategy is to ensure that all communities and stakeholders across the district are involved in the preparation of the Local Plan.

An EqlA was undertaken to inform the Launch Document, the Spring 2024 Options Document, The Local Plan Reset Document and the Engagement and Communication Strategy.

Once adopted, the new Local Plan 2025-2043 will replace the current Local Plan and be implemented by various Council departments, including planning services, as well as other public service providers and the private sector. Intended outcomes from the new Local Plan will be monitored in the B&NES **Local Authority Monitoring Report**.

1.2 Provide brief details of the scope of the policy or service being reviewed, for example: ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there?	Local authorities are statutorily required to prepare a Local Plan and update as necessary. The preparation of the new Local Plan 2025-2043 is included in the B&NES Local Development Scheme (LDS), the Council's formal Planning Policy work programme. Plan-making is a statutory process and follows national regulations. In late 2024 the government published some important changes to national policy to achieve sustainable growth through the planning system. This included changes to how mandatory housing targets are calculated and how the green belt is defined. As a result, B&NES is required to plan for a significantly larger amount of housing through the Local Plan. The housing requirement has increased from a little over 700 new homes per year to around 1,500. Due to the scale of change and significant implications of the revised National Planning Policy Framework (NPPF), the Council reset the previous work it was doing on the Local Plan to allow further evidence work and assessment of further options to consider the increased levels of development now required. The Local Plan 2025-2043 is at the options stage. This provides the opportunity for the Council to test different options with local communities, stakeholders and the development industry without a formal commitment to a policy. The Options Document therefore sets out policy approaches for consultation. This will enable the demonstration at examination that 'reasonable alternatives' have been considered in the plan-making process. The Plan will be subject to examination by a government appointed Planning Inspector to ascertain its 'soundness'. The examining Inspector will need to ascertain that the plan is an appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Therefore, the options consultation stage in the process is necessary in order to explore various alternative approaches and proposals.
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	It is recognised that views have already been expressed as part of the Options Document Consultation that took place in Spring 2024, before the Local Plan was reset. Comments received remain valid and will still be considered in the development of the Draft Local Plan. The new Options Document primarily focusses on options for providing the additional development required. It sets out suggested changes to policy approaches or site options, following the national policy changes. It is necessary to repeat the Options Document (Regulation 18) stage to create a sound plan and ensure everyone has the opportunity to engage in the process of updating B&NES' new Local Plan.
1.3 Do the aims of this policy link to or conflict with any other policies of the Council?	The Local Plan 2025-2043 is being prepared in the context of the National Planning Policy Framework (NPPF) December 2024 and a number of Council strategies. It will also facilitate the delivery of Council objectives. The B&NES Council Corporate Strategy 2023-2027 (adopted July 2023) sets out the Council's overarching strategic plan with the overriding purpose 'to improve people's lives'. The two core policies within the Strategy focus on tackling the climate and nature emergency and giving people a bigger say. To translate the purpose into commitments, three principles have been identified: preparing for the future, delivering for local residents and focussing on prevention. The Local Plan aligns with Council priorities as it aims to help deliver for local residents and give people a bigger say in how the district will grow and change until 2043. There is a focus on prevention to tackle inequalities and improve local areas, as well as preparing for the future in terms of working towards a resilient, sustainable economy that is fair, green, creative and connected. The Options Document is an important step in updating the Local Plan and giving people a bigger say, as it serves as a consultation document outlining different policy and site options; it invites the public and stakeholders to provide feedback and help shape the Draft Local Plan.

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
2.1 What equalities training have staff received to enable them to understand the needs of our diverse community?	Equality, Diversity and Inclusion training is mandatory for the B&NES workforce.
2.2 What is the equalities profile of service users?	The B&NES Local Plan 2025-2043 covers the full B&NES Council local authority area. The most up to date data for the B&NES area (including Equalities data) can be found at: https://beta.bathnes.gov.uk/strategic-evidence The B&NES Local Housing Needs Assessment (LHNA) January 2024 Draft includes data relating to the housing needs of different groups, including older people and disabled people.
2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	During the initial Options Document consultation in Spring 2024, some equality data was collected. This will continue to be collected as we progress with consultation on the new Options, Publication and Submission Drafts of the new Local Plan to measure performance and implement improvement in relation to equality and diversity. The equality data collected during the Options Document in Spring 2024 will inform the engagement for the Options Document consultation in October 2025, which aims to increase outreach. More information will be outlined in the EQIA for The Engagement and Communication Strategy.
2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	In line with the Engagement and Consultation Strategy for the Local Plan 2025-2043 (informed by the B&NES Statement of Community Involvement (SCI) for Planning 2022), consultation will continue to take place with a wide range of stakeholders, including targeted engagement with SCI seldom-heard groups to inform the development of the Options Document (Reg.18) of the new Local Plan.

2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	There is ongoing engagement and communication on the new Local Plan as it progresses through its different stages until final adoption. The Engagement and Communication Strategy for the new Local Plan sets out the opportunities for communities and stakeholders, including seldom-heard groups to be involved in the preparation of the Plan. The Strategy is currently being updated and is being delivered by the Planning Policy Team, with assistance from other services within the Council, including the Regeneration Team. The overall intended outcome of the strategy is to ensure that all communities and stakeholders across the district are given the opportunity to be involved in the preparation of the Local Plan. There will be a variety of opportunities to provide feedback. The Options Document and consultation will be published in an accessible format on the Participatr website, with a link from the B&NES website and the option to download a PDF version. The websites will include contact details for further accessibility requirements. An easy read version will be made available and copies of the document will be made available at One Stop Shops. Translation and Interpretation services will be provided on request or where a need is already known. Equalities data and feedback will continue to inform how we measure performance and improvement in relation to equality and diversity.
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3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

The B&NES Local Plan 2025-2043 – Options Document

The Options Document represents an early stage in the preparation of the Local Plan. Throughout the preparation process the equalities impact of the Local Plan will be carefully considered. At the Options stage the EqIA is primarily focussed on identifying and referencing the opportunities for the Local Plan to address equalities issues and the needs of people with protected characteristics. The Options Document includes options relating to a range of policy areas, including Housing, Climate Change, Nature and Ecosystem Services, Green Belt, Jobs and Economy, Healthy and Vibrant Communities and Minerals and Waste. It also outlines Spatial Options and the fundamental principles that will guide the strategy across B&NES for accommodating new housing, employment development and supporting infrastructure, whilst addressing climate, nature and health and well-being needs.

At the Draft Local Plan (Reg 19) stage the Council will be setting out its proposed policies. As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data. The EqIA is therefore, an iterative process that will help to ensure the Local Plan addresses equalities issues and that its policies provide opportunities to ensure development proposals properly address the needs of everyone including people with protected characteristics.

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	Opportunities for the Local Plan to address equalities issues and the needs of people with protected characteristics include the following key areas:	

	-Housing Affordability and the Economy -Climate and Ecological Emergencies -Health and Well-being -Transport and Connectivity -Culture and Community Identity Development Management Policy Options In the previous Options Document (Spring 2024), the Council consulted on a range of policy areas. This was outlined in the previous Equalities Impact Assessment (January 2024). Comments from the previous consultation will still be considered as the Local Plan progresses. This Options Document primarily focuses consultation on new policy areas not presented previously or proposed changes to policy approaches since the last consultation, following national policy changes. This Options Document includes consultation on the following policy areas where there is an opportunity to promote equality and address equalities issues: - Proposals to support wider affordable housing delivery within B&NES to benefit all.	
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	- Housing policy options support a balanced housing mix that meets the needs of different local communities, including those who require affordable housing, families with children, older people, students, young professionals, disabled people, service families and the Traveller community. Housing policy options ensure these needs are reflected in planning policies. -Proposed policy approaches to address the Climate Emergency recognise that climate change affects different areas and communities differently. Policy options seek to ensure climate adaptation and resilience, whilst managing the impacts of climate change to ensure communities are not disproportionately affected. -Proposed policy approaches to address the Climate Emergency support renewable and sustainable energy, which has environmental, public health and economic benefits to all. It helps improve the security of energy supply and reduce energy costs. -Policy approaches that seek to address the Nature Emergency have opportunities to support inclusive design access for all. Relevant natural environment policies propose access for all to green	
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	infrastructure, as well as nature recovery opportunities. This has environmental, social and economic benefits for everyone, as well as positively impacting health and wellbeing. - Healthy and Vibrant Communities policy options contribute toward creating sustainable, inclusive and healthy places with access to facilities and reduced travel need. Policy options help create inclusive and accessible public realm with access to green space which has health and wellbeing benefits for all. Spatial Policy Options This Options Document proposes new site options to respond to the additional need for development and the revised housing requirement set out in the latest national planning policy changes based on the government's revised standard methodology. - Affordable housing delivery within residential development to be sought in accordance with policy. - Opportunities for a mix of housing, including to meet the needs of different groups in the community. - Opportunities to support sustainable energy and therefore, residents with rising energy costs.	
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	- Opportunities to support inclusive design and to ensure access for all to green infrastructure and nature recovery opportunities. - The public realm and facilities should provide inclusive design to support access for all and achieve healthy, inclusive, and safe places. - Consider sustainable transport opportunities and transport requirements for managing development to support accessibility for all, including older people and disabled people. - Improve connectivity and access to attractive walking, wheeling and cycling infrastructure, as well as reliable public transport to increase inclusive travel options.	
3.2 Sex – identify the impact/potential impact of the policy on women and men.	To provide the planning policy framework to support: - The delivery of inclusive design. - The location and design of development that is accessible to all and secure by design, including open space, the public realm and transport infrastructure.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.3 Pregnancy and maternity	To provide the planning policy framework to support: - The delivery of inclusive design.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.

	- Inclusive design access for all and accessibility standards help meet the access needs of not only older and disabled people, but the whole community, including pregnant & breastfeeding/feeding parents & parents with pushchairs. - The location and design of development that is accessible to all and secure by design, including open space, the public realm and transport infrastructure.	
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	To provide the planning policy framework to support: - The delivery of inclusive design. - The location and design of development is accessible to all and secure by design, including open space, the public realm and transport infrastructure.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	To provide the planning policy framework to support: - The delivery of inclusive design. - Inclusive design access for all, together with accessibility and space standards help to meet the need of disabled people. - Options include accessibility standards for adaptable and accessible housing and wheelchair housing. - The location and design of development is accessible to all including open space,	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.

	the public realm and transport infrastructure. -The delivery of affordable housing. -Sustainable/renewable energy which will help support residents with rising energy costs.	
3.6 Age – identify the impact/potential impact of the policy on different age groups	To provide the planning policy framework to support: - The delivery of affordable housing, including for younger and older people. - The location and design of development is accessible to all and secure by design, including open spaces, the public realm and transport infrastructure. The risks of digital exclusion particularly for older people will be considered within consultation.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.7 Race – identify the impact/potential impact on across different ethnic groups	To provide the planning policy framework to support: -The delivery of affordable housing. -Provision of sustainable/renewable energy and lower energy/zero carbon homes which will support residents with rising energy costs. The Housing policy options provide a range of policy options to ensure that that the housing needs of different groups in the community are reflected in planning	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.

	policies, including the Traveller community.	
3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	Opportunities to consider proposed policy and equality considerations have been highlighted above and proposed actions are set out under Section 4.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	Opportunities to consider proposed policy and equality considerations have been highlighted above and proposed actions are set out under Section 4.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	Opportunities to consider proposed policy and equality considerations have been highlighted above and proposed actions are set out under Section 4.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement but is a local priority).	To provide the planning policy framework to support including: - The delivery of affordable housing. - Opportunities to provide sustainable/renewable energy and lower energy/zero carbon homes which will support sustainable energy and residents with rising energy costs. The risks of digital exclusion particularly for people on lower incomes will be considered within consultation.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.

3.12 Rural communities* identify the impact / potential impact on people living in rural communities	To provide the policy framework to support: -The delivery of affordable housing, including in rural communities to help increase the social sustainability of rural areas and relieve difficulties for an aging population. -The creation of vibrant, inclusive rural communities where different groups of people can live, work and thrive, supported by accessible services and strong social infrastructure. -Increased rural connectivity by delivering a network of safe, accessible walking, cycling and wheeling routes, improving public transport and digital infrastructure. This will reduce the barrier to business growth, home working, access to services and support social and economic inclusion.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).	The Housing policy options provide a range of policy options to ensure that the housing needs of different groups in the community are reflected in planning policies, including those who require affordable housing, families with children, older people, students, disabled people, service families the Traveller community and the Armed Forces Community.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.

3.14 Care Experienced*** This working definition is currently under review and therefore subject to change: In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential care, or a or a special guardianship arrangement.	-The Housing policy options provide a range of policy options to ensure that that the housing needs of different groups in the community are reflected in planning policies, including those who require affordable housing.	
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

***The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
The Engagement and Communication Strategy for the B&NES Local Plan 2025-2043 to continue to include equality considerations within consultation processes.	Consultation to meet the statutory requirements set out in the Town and Country Planning Regulations and Bath and B&NES Statement of Community Involvement for Planning 2022.		Planning Policy Team with support from the Regeneration Team	On-going
Accessible format of the Options Document and consultation online with opportunities for feedback.	The Options Document and consultation will be published in an accessible format on the Participatr website. There will be a link to the consultation platform from the B&NES website and contact details will be provided to request further accessibility requirements. There will be a variety of opportunities to provide feedback.		Planning Policy Team with support from the Regeneration Team	Options Document Consultation Oct/Nov 2025
Equality data collection and feedback.	Equality data collection and feedback to continue to inform how we measure performance		Planning Policy Team	Different consultation stages of the Local

	and improvement in relation to equality and diversity.			Plan 2025-2043.
Identified opportunities within the Reg. 18 EqIA to address equalities issues and the needs of people with protected characteristics within policy development for the Publication Draft of the new B&NES Local Plan 2025-2043.	Lead policy officers to consider equality considerations within policy development for the Publication Draft of the new B&NES Local Plan 2025-2043.		Planning Policy Team	2025/2026
Viability testing to consider impact of development requirements in the B&NES Local Plan on wider planning obligations and any equality impacts.	Viability testing of proposed policy.		Planning Policy Team	2026

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: Louise Morris

(Head of Planning and Building Control)

Date: 01.09.2025