



Manor Road, Saltford

Representations on the BANES Local Plan Partial Update Proposed Submission Draft (Regulation 19)

Oct 2021

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1. Introduction

- 1.1 These representations are submitted by Crest Nicholson in respect of land south of Manor Road, Saltford.
- 1.2 Crest Nicholson is promoting the land south of Manor Road, Saltford for circa 100 residential dwellings. The site (approximately 8.3 acres), if allocated, would create future housing in the village and civil parish of Saltford.
- 1.3 BANES Council is currently consulting on a Partial Update of its Local Plan, and the process has reached the Regulation 19 stage. However, a Partial Update of the Local Plan fails to effectively tackle the impacts of climate change and provide new homes in the most sustainable locations within the district. The Local Plan review should be to focus on updating the overarching strategy, jointly with its West of England counterparts, through the WECA Spatial Development Strategy (SDS) and simultaneously working on a full review of its Local Plan to efficiently deliver the BANES element of the SDS. Therefore, we object to the Partial Update of the plan and suggest that as it is currently proposed, the plan is probably unsound. The Council need to focus resources and time to carry out a full review of the Local Plan to effectively address the needs of the area and its community while meeting national policy.
- 1.4 The Council is consulting on the emerging Plan at the successive stages of its preparation; however, the publication of the Regulation 19 version of the Partial Review demonstrates that this is an entirely ineffective process as BANES Council have overlooked all our previous consultations and submissions by Crest Nicholson and other parties who have pointed to the purposeless of the Council's current plan-making exercise.

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2. The need for a full review of the Local Plan

BANES Local Plan Review

- 2.1 Seven years on from the adoption of the Core Strategy (CS), there is a clear need to undertake an immediate, full review of the BANES Local Plan. The CS was never designed to have adequate flexibility to deal with the changing circumstances we are seeing over the long-term, including tackling the impacts of climate change and building homes that meet the current and future needs of the community in the district.
- 2.2 During the Examination of the CS in 2014, the BANES Core Strategy Inspector foresaw that an early review would be required as he could see that a shortfall would arise towards the end of the BANES Core Strategy Plan period. At the time, it was estimated by the Inspector that this would be timed with the review of the West of England Core Strategies in circa 2016. BANES themselves recognised the need for an early review of the CS and, over the period 2016 – 2019, it worked on a full Local Plan review alongside the preparation of the JSP.
- 2.3 The JSP has now been withdrawn. However, a full and immediate review of the Local Plan is required to align with the preparation of the joint strategic SDS to ensure the timely delivery of the strategic policies. This includes strategic and non-strategic growth areas, as well as any updates to development management policies.
- 2.4 The simultaneous preparation of a strategic SDS and new Local Plan policy is the approach being taken by Bristol and South Gloucestershire Councils as the optimum solution. Whilst not part of the WECA SDS, even North Somerset is aligning its new Local Plan preparation with the SDS to try to satisfy the Duty to Cooperate. All the other West of England authorities faced with the same cross boundary issues to deliver the one or two HMAs' housing needs aim to adopt their new Local Plans in 2023 (or shortly after the SDS is adopted should the SDS be further delayed). BANES circumstances are identical and, therefore, they should also focus their resources on a full, immediate Local Plan review.
- 2.5 As the NPPF states in para 15 – *“the planning system should be plan-led”* and this requires that plans be kept up to date – that is the purpose behind the ‘at least five yearly reviews’. As per para 33 of the NPPF – *“Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly”*. Para 064 of the NPPG states *“the review process is a method to ensure that a plan and the policies within remains effective”*. For the plan to remain effective, a full review of the strategy is needed.
- 2.6 Being effective is one of the key tests of soundness. In respect of strategic matters, to be sound, para 36 of the NPPF defines this as *“effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred”*. The soundness test requires the plan to be ‘positively prepared’. By dealing with only a small element of supply at the tail end of a plan period, it is not positively prepared. The plan should be dealing with the bigger cross boundary issues that need to be resolved in the interests of proper sustainable long-term planning that is required.

Partial Update and New Local Plan timetable

- 2.7 The timetable for the Partial Update is ambitious as it is less than 18 months from start to finish. Since the Reg 18 document published for consultation in February 2021, the anticipated date for adoption of the Local Plan Partial Update has been delayed from Spring 2022 to Summer 2022. It is significant to note this as if the programme is delayed it will further knock on to the new Local Plan.
- 2.8 The timetable for the Local Plan Partial Update envisages the following programme:

Jan/Feb 2021	Engagement on Options (Regulation 18)
Spring 2021	Formal consultation on Draft Partial Update (Regulation 19)
Winter 2021	Submit Plan for examination (Regulation 21)
Spring 2022	Examination hearings
Summer 2022	Adoption

2.9 The 2020 BANES LDS does not provide a programme for each of the key stages of the new Local Plan. Although, a timetable suggests that work on the new Local Plan will only start early in 2022 when the Council anticipate that the Partial Update Examination is complete. If it takes 3 - 4 years to prepare and adopt the New Local Plan (which is optimistic), we estimate it is likely to be at least 2025-26 until the New Local Plan is adopted. This will have knock on effects on the New Local Plan timetable which could push it into 2027, or beyond. It should be considered that if the new Local Plan does not materialise until 2027 or later, BANES could encounter a housing supply shortfall as it can take many years for allocations to generate completions.

Summary

2.10 Firstly, as addressed above, it was always the intention that the housing requirement and strategy for BANES would be addressed as part of an immediate review of the Core Strategy. 7 years on, that still has not been progressed; and since the JSP was withdrawn, the need for cross boundary working has intensified because of Standard Method 2 (published by government in December 2020).

2.11 Secondly, the evidence above shows that the two development plan processes – i.e., the SDS and the new Local Plan need to be prepared in parallel so that the SDS can be implemented in a timely fashion and provide certainty for the longer-term supply of additional housing and economic development. BANES envisaged it would be as part of the simultaneous JSP and Core Strategy Review processes and that is, considered by us, the optimum arrangement today. This is an approach taken by three other West of England authorities. They are embarking on a full Local Plan Review now, to be adopted soon after the SDS as the most prudent solution.

2.12 The Partial Update is preventing the LPA from taking forward the new Local Plan in parallel with the SDS and is not the most effective use of limited resources. BANES LDS does not set out a full programme for the new Local Plan as they do not envisage that it will start until the Partial Update has been examined – until at least spring 2022. This is presumably due to constraints that prevent them working on the SDS, Partial Update, and new Local Plan all at the same time.

2.13 And thirdly, BANES needs to embark on the new Local Plan now – it took 7 years to adopt its Core Strategy and 10 years to have a complete Local Plan with site allocations in place. Therefore, the time to prepare the new Local Plan should not be underestimated. To attempt to complete a Partial Update before turning to the new Local Plan is not the most prudent use of resources needed to keep the long-term strategy up to date and is not sound, as all the Partial Update elements can be addressed in the new Local Plan.

2.14 The longer it takes the new Local Plan process to begin (e.g., if adopted in 2027, that will be 6 years into the SDS period 2021 - 2041) and if the housing requirement in BANES is higher than it is currently making provision for, this will create a higher annual requirement over a shorter remaining timeframe thus creating further housing land supply issues in 2030/31 onwards.

3. Development Management Policies

- 3.1 The BANES Partial Update Regulation 19 consultation proposes to update a large proportion of the development management policies.
- 3.2 The Schedule of Changes and the Composite Documents comprising the Partial Update consultation documents, set out the proposed changes to the development management policies which we have reviewed. Most of the proposed changes appear to be relatively small changes and even the ones BANES claim are substantive or vital, have little consequence in practice, particularly, in terms of addressing the climate emergency. We question the need to review these policies at all via the Local Plan Partial Update. They will be covered in forthcoming changes to Building Regulations, PRS Regulations, and the enactment of the Environment Bill.
- 3.3 For BANES, the need for an immediate Partial Update as opposed to a full plan review appears to be predicated on an urgent need to address the climate and ecological emergency. However, these matters are all in train at a national level, in terms of future changes to legislation. Whilst the Partial Update claims the benefit will come from getting local policy in place sooner than national changes, in reality, that may only amount to circa 1 – 2 years if delays are encountered with the Partial Update. We anticipate there will be delays, as 1 year to adoption is very optimistic and the SDS process will compete for resources too. In any event, the programme for bringing into effect the changes to buildings regulation and PRS regulations to improve the energy efficiency of building is timed to give the development industry and the housing sector time to adapt and plan for these more stringent requirements. During Examination, the same issue may arise – i.e., to be sound, the policies may need to be phased in and standards increased over time, such that the Partial Update does not then actually add any benefit as it will be overtaken by changes to building regulations.
- 3.4 We feel the other recommended changes to development management policies are even less significant and all the development management policies can be adopted as part of a new Local Plan. This phase of consultation could serve to inform the changes to the final set of development management policies in the new Local Plan document, alongside the strategic and non-strategic policies.

4. Addressing Housing Supply

- 4.1 Chapter 3 of the Regulation 19 consultation document examines the BANES housing supply shortfall, reviews existing allocations, and identifies new opportunities to attempt to increase future supply.

Housing supply

- 4.2 Of the 13,000 dwelling requirement in the Core Strategy, the Topic Paper on Housing Supply (August 2021) states that 8,150 dwellings have been built between 2011 and 2021 and the remaining requirement is 4,850 dwellings. The Council calculate a future supply of 4,671 dwellings within the plan period to 2029 which leaves a shortfall of 200 dwellings against the Core Strategy requirement.
- 4.3 BANES calculate that satisfying the Housing Delivery Test (HDT) requirements (i.e., delivering 722 dwellings per annum over the remaining 9 years), generates an overall additional requirement of 1,200 homes to 2029 when compared with their housing supply trajectory (i.e., $722 \times 9 - 4,671 = 1,827$ homes shortfall). BANES takes the HDT shortfall approach as one of the key reasons for needing to partially review the plan. However, we consider this to be a crude approach that requires a finer grained analysis. HDT is not about individual years supply, but 3-year periods of supply grouped together and compared with the 3-year requirement – i.e., an

LPA will not be penalised if there is a shortfall in one year alone – it is about their performance over 3 years.

- 4.4 Of the proposed housing sites, we note that apart from the safeguarded land at East Keynsham, all the new and amended housing allocations proposed in the Partial Update are all capable of delivery without the Partial Update as they are within the urban area and matters can be resolved via planning applications. If these sites are genuinely available, given the age of the Core Strategy and the need to prepare and implement a strategic plan that deals with cross boundary issues, on balance, the imperative should be to prepare a new Plan.
- 4.5 For BANES, it is vital that development of all types is directed to the right places in the district. It is important to support the housing requirements of the larger settlements of the district but to also support the housing needs of other settlements in the hierarchy. The larger villages that sit in sustainably strategic locations should be considered for housing take up along with the larger settlements in the district. The towns and villages outside of the city must be sustainable. They need good connections to key employment destinations, especially by public transport.
- 4.6 Strategic sites that will deliver either planned new infrastructure or sites which can utilise new and existing infrastructure will create both sustainable and deliverable schemes that can contribute to affordable and market housing. As mentioned already, the delivery of housing and social infrastructure at the towns and villages in BANES will help; fund the infrastructure necessary to connect them, galvanise their high streets, and underpin their strong community identity. This an important consideration when looking at the longevity and sustainability of a community. A consistent under supply of housing in Saltford significantly impacts the affordability of houses in the village, both in terms of open market affordability and social housing. The under supply of housing also constrains the ability for local businesses to thrive and grow.
- 4.7 The right solution is to update the housing numbers and overall spatial strategy now, dealing with short (to 2029) and long term (2030+) land supply issues together. This requires turning to the new Local Plan alongside the SDS right away, rather than waiting until the Partial Update is complete, creating longer term supply problems (i.e., beyond 2030) which would be catastrophic for sustainable housing delivery

Spatial strategy

- 4.8 The consultation document states that as it is a Partial Update, “*the existing spatial strategy must be the basis for identifying and allocating sites for delivering additional housing*” (para 3.7).
- 4.9 Para 3.8 goes on to say, after Bath “*Keynsham is the next most sustainable location for accommodating housing within the District*”. We recognise Keynsham and land within BANES on the edge of Bristol as a sustainable location for growth. The area has excellent existing public transport links and opportunities for further mass transit improvements. With sustainable access to the greatest range of jobs, education and high and low order services, the village of Saltford should not be overlooked, as just as Keynsham, Saltford, benefits from its strategic location between Bristol and Bath.
- 4.10 The BANES Climate Emergency Progress Report (Oct 2019) has ‘*a major shift to mass transport, walking and cycling to reduce transport emissions*’ as one of three immediate priorities it is pursuing to reduce its carbon footprint. The site at Saltford is on the Bristol-Bath A4 corridor which is earmarked for mass transit improvements that will provide high quality links to Bristol, as well as Bath, and locations between the two. A fundamental review of the whole strategy is required to ensure a sustainable long-term strategy can be put in place that deals with the immediate and the long term and reflects the necessary lead in times for strategic sites such as Manor Road, Saltford, to deliver development in the most sustainable locations with the greatest benefits for climate change.

Green Belt Review

4.11 BANES describes the need to address housing land supply constraints as one of the key reasons for undertaking the Partial Update. Safeguarded land at East Keynsham is one of the key sites to be allocated to attempt to address the supply shortfall.

4.12 However, it would appear that the safeguarded land at East Keynsham is not deliverable on its own as it will require transport improvements that may require additional land to be taken out of the Green Belt.

4.13 NPPF policy on Green Belts means that this is not a straightforward task and one that cannot be undertaken in isolation (i.e., just looking at the Green Belt around Keynsham). To meet NPPF Green Belt policy, the Council will need to demonstrate that exceptional circumstances exist (para 137), demonstrating that it has examined fully all other reasonable options for meeting the identified need for development, assessed as follows:

- make as much use as possible of suitable brownfield sites and underutilised land;
- Optimise the density of development including policies which promote a significant uplift in minimum density standards; and
- Having discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through a statement of common ground.

4.14 Drawing up changes to the Green Belt, the Council will need to promote sustainable patterns of development and consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it is concluded necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport (NPPF, para 138).

4.15 It is difficult to see how this evidence can be comprehensive and fully justified without undertaking a full Green Belt Review, which includes an assessment of other sustainable locations in the Green Belt (e.g., Manor Road, Saltford), as well as non-Green Belt locations. The consultation document states that the safeguarded land at Keynsham is not deliverable without interventions, *“the Council will need to carefully consider alternative solutions, including greenfield sites to the south of the District and outside the Green Belt, if these are demonstrated to be sufficiently sustainable, as well as smaller, non-strategic greenfield sites on the edge of Bath within the Green Belt”*. This suggests that the Council will be considering changes to the Green Belt in other locations if Keynsham is not deliverable and, our point is, to satisfy NPPF policy on Green Belt and promoting sustainable patterns of development, all sustainable locations for development would need to be considered in this review, including Hicks Gate on the edge of Bristol and Manor Road, Saltford.

4.16 The adopted Core Strategy directs some housing development of around 50 dwellings, primarily aimed at meeting local needs, towards the larger and more sustainable villages (i.e., those with a greater range of services and facilities and better public transport accessibility to the main centres in BANES); however, none of these dwellings were directed to Saltford, a Green Belt Village with many of its own amenities and located on the strategic road network (A4) between Keynsham and Bath.

4.17 BANES recognise that in distributing housing growth the role of the Green Belt must also be considered. Some of the most sustainable settlements within BANES, most notably Bath and Keynsham, are tightly surrounded by the Green Belt. Therefore, the amount of development provided on sites adjoining these settlements is more limited than otherwise would be the case.

Some land was removed from the Green Belt in the Core Strategy and allocated for housing development adjoining Bath, Keynsham and Whitchurch (the latter being more sustainably linked to Bristol rather than centres within BANES). At a strategic level, opportunities on the edge of Bath were assessed and allocated where appropriate through preparing the Core Strategy. The impact of development on the edge of the City not only in Green Belt terms, but on the World Heritage Site and its setting, the Cotswolds AONB and other environmental assets, was shown to limit development potential. Circumstances are not considered to have changed since adoption of these Development Plan Documents.

4.18 At Keynsham, land well related to the Bristol-Bath public transport corridor, has already been removed from the Green Belt on the eastern side of the town. Some of this land was allocated for housing and employment development in the Core Strategy and is currently being developed. The remainder of the land was safeguarded for future development pending review of the Core Strategy and its deliverability. This review is now being undertaken through this partial update of the Local Plan. Therefore, as set out below and subject to evidence on its deliverability there is the opportunity to allocate this land for development now. The Options consultation recognises the importance of the how sustainably Keynsham is located given the Bristol-Bath public transport corridor, but in not carrying out a full review of the Plan it does not provide opportunity for an assessment of housing to be delivered in other sustainable locations along the same public transport corridor, namely Saltford.

5. Development at Saltford

5.1 Saltford is classified as a Rural Village which is excluded from but tightly surrounded by the Green Belt. The village is sustainably located in relation to Bath, Bristol and Keynsham, and at a more local level, the site is close to the centre of the village and its related facilities. The village is connected with accessible links along the A4 to both Bath and Bristol, with both city centres under 7 miles away. The nearest railway station is situated 2.5 miles west of the site in Keynsham, where the station is served by Great Western Railway and Southwestern Railway. Direct destinations by rail include Brighton; Southampton Central; Cardiff; Bath Spa; Gloucester; and Bristol Temple Meads. As well as sustainable road and rail links, the village offers bus services to destinations including Keynsham, Bath, and Bristol. The location and the sites' connectivity would give the option for future residents to take sustainable transport to places of employment, education, and leisure.

5.2 Saltford is a relatively large village with three public houses, a village hall, a Post Office, and Community Library, recreation grounds, a golf club, and a primary school (Saltford Church of England Primary School). Delivery of housing and social infrastructure in the villages of Bath and North East Somerset will help fund the infrastructure necessary to connect them, galvanise their high streets, and underpin their strong community identity. Saltford needs growth to ensure that it retains its diverse and increasingly challenged village amenities and facilities.

5.3 As well as the existing business in Saltford, new business's need to be supported in the village. The soon to be opened Flourish Foodhall & Kitchen, a speciality and fine food wholesale distributor which will sell produce from local farmers and providing circa 40 jobs in the area is due to open by Summer 2021. It is important that this business and the others in Saltford can continue to generate a local economy.

5.4 In addition to the business facilities in the village, it should be noted how the village is well connected to areas of nature and provide opportunities for residents to partake in fitness and leisure activities without needing to travel by vehicle. The recreation grounds to the northwest of the village offer football and cricket facilities as well as tennis courts. The village has several footpaths (PROWs) connecting it to neighbouring village settlements and to open countryside.

The River Avon runs through the village and has footpaths and cycle routes along the river. Existing and future residents can enjoy the health and well-being benefits of having these facilities on their doorstep.

- 5.5 Saltford has its own primary school, with close proximity, within a walkable distance from much of the village. The location of the school mean that future and existing residents access the school by foot rather than by car use, promoting a healthy and sustainable lifestyle.

Saltford Green Belt

- 5.6 The purpose of the Green Belt includes the prevention of merging Bristol with Keynsham, Saltford and Bath, and the preservation of individual character, identity, and setting of Keynsham and the villages and hamlets within the Green Belt. The importance of preventing the merging of Keynsham and Saltford is on the basis that these settlements are located between Bristol and Bath and the existing Green Belt gap between the two settlements is relatively narrow. Preventing the merging of settlements along the transport corridor between Bristol and Bath and Bath Green Belt, and this remains an important objective as reflected in the purposes of the Green Belt set out in the Options consultation.
- 5.7 The Green Belt around Saltford has been reviewed on several occasions for plan making. In April 2013, a Green Belt Review Stage 1 Report was produced by Arup as part of the evidence base information the Core Strategy Examination. The site was included within one of 16 land parcels and referred to as “south of Saltford” and appraised against the five Green belt “purposes” described in the NPPF (note these have not changed). They were also appraised against a sixth “local” purpose – to reserve the individual identity of Keynsham and the villages and hamlets within the Green Belt. In summary the parcel of land, which is larger than the site, was considered to be of high importance for preventing the mergers of towns, was seen as serving the purpose of protecting the countryside from encroachment, assisting urban regeneration, and preserving the identify and setting of Saltford.
- 5.8 Most recently in 2015 and 2016, the Green Belt was reviewed as part of the JSP Green Belt Assessment. In November 2015, the site was included in Cell 43 “South of Saltford” and was assured as serving three of the five purposes of the Green Belt (preventing merger, preventing countryside from encroachment, and assisting in urban regeneration). In November 2016, the JSP Green Belt Assessment Stage 2 was undertaken. This stage sought to further review the cells reviewed in Stage 1. The site located to the south of Saltford, off Manor Road, was considered to contribute to the Green Belt by safeguarding the countryside from encroachment. When assessing Green Belt Land for release for plan making, land to the south of Manor Road, Saltford has consistently been viewed as being of importance by the contribution to openness and protecting the countryside from encroachment, even though the site only forms a small part of the Cell 43 identified in the 2015 Green Belt Review. Land sandwiched between the artificially managed Golf Course and the built-up area of Saltford lies within a substantial sub area of Green Belt, and future development of the land would not compromise the future of the Golf Course or its overall setting. Permanent buffers/boundaries to Saltford, i.e., the golf course and Folly Wood to the south of the golf course. Land to the north and west of the village serves the purpose of preventing the merger of Saltford and Keynsham and land to the east is constrained by the Flood Risk from the River Avon. Appropriately sized development to the south of the village, which is in proximity to the village school and village amenities would make a logical location for housing delivery.
- 5.9 The BANES Climate Emergency Progress Report (Oct 2019) has ‘a major shift to mass transport, walking and cycling to reduce transport emissions as one of three immediate priorities it is pursuing to reduce its carbon footprint. New development south of Manor Road, Saltford offers

a variety of different sustainable transport solutions to avoid the need for travel by the private car. The Partial Update approach means that its ability to address climate change issues is limited to the nature of it being partial, and by having to fit within an existing strategy that began life over 10 years ago in a different context. A fundamental review of the whole spatial strategy for BANES is required to deliver development in the most sustainable locations with the greatest benefits for tackling climate change.

6. Conclusion

- 6.1 The climate emergency declared by BANES strengthens the argument that directing future development to locations that avoid the need to travel, but where travel is necessary, promote movements by sustainable means and by travelling the shortest distances. Not only is Saltford one of the more sustainable location for development relating to Keynsham, Bristol and Bath in BANES, it has the facilities in the village itself that would benefit from the economic support of housing growth.
- 6.2 BANES is the only WECA authority pursuing a Partial Update of its Core Strategy and Placemaking Plan. All the other West of England authorities will be preparing a new Local Plan, timed to closely follow the SDS programme, with adoption soon after adoption of the SDS, as it should be. It is the same local planning authorities preparing the SDS as are preparing the individual district local plans, so this arrangement should not be that difficult to follow.
- 6.3 A Partial Update is not necessary. Resources would be far better spent on a new Local Plan which incorporates the proposals in the Partial Update, as well as the pressing strategic matters.
- 6.4 In terms of the real consequences and effectiveness of the proposed changes to the development management policies, these changes amount to little more than tinkering and even if necessary, could be better made through a comprehensive and fully coherent new Local Plan.
- 6.5 If additional land needs to be removed from the Green Belt to deliver safeguarded land at East Keynsham or land removed from the Green Belt around Bath, it is difficult to see how this evidence can be comprehensive and fully justified without undertaking a full Green Belt Review, which includes an assessment of other sustainable locations in the Green Belt (eg at Manor Road, Saltford), as well as non-Green Belt locations. To satisfy NPPF policy on Green Belt and promoting sustainable patterns of development, all sustainable locations for development would need to be considered, including Hicks Gate on the edge of Bristol and Manor Road Saltford.
- 6.6 We believe that the evidence supports the need to re-focus the resource on getting the SDS in place and doing so in tandem with a new Local Plan for BANES, and work on a Partial Update is not necessary or sound.

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