

**Bath and North East Somerset Council Response to
Inspector's Initial Matters, Issues and Questions
(EXAM 4)**

Matter 2 Strategic Policies

06 June 2022

(Questions 12 and 13)

**Bath & North East
Somerset Council**

Improving People's Lives

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Matter 2: Strategic Policies

Issue: Is the Plan's approach to strategic policies consistent with national policy?

Q.12 Paragraph 29a of the submitted Plan sets out that all policies in the Core Strategy and Placemaking Plan are 'strategic' policies. Is this justified and consistent with national policy as set out in the National Planning Policy Framework (NPPF)? What is the evidence that the strategic policies of the Plan are limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues)?

B&NES Response:

12.1 NPPF paragraph 17 requires the development plan to include strategic policies to address each planning authority's priorities for the development and use of land in its area. The adopted Local Plan, comprising the Core Strategy and Placemaking Plan, sets out the Vision and Objectives for the District responding to the key issues identified. The strategic objectives are stated in pages 21 -23 of the adopted Plan ([CD-SD019](#)).

Table 1: Adopted Local Plan Objectives

Objective 1: Pursue a low carbon and sustainable future in a changing climate
Objective 2: Protect and enhance the District's natural, built and cultural assets and provide green infrastructure
Objective 3: Encourage economic development, diversification and prosperity
Objective 4: Invest in our city, town and local centres
Objective 5: Meet housing needs
Objective 6: Plan for development that promotes health and well being
Objective 7: Deliver well connected places accessible by sustainable means of transport

12.2 NPPF (July 2021) paragraph 20 sets out what strategic policies should address.

20. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development. b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat). c) community facilities (such as health, education and cultural infrastructure); and d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

12.3 All Local Plan policies are assessed against the Council's Objectives set out in the Local Plan and NPPF paragraph 20 requirements above, and all policies deliver the Council's objectives/strategic priorities set out in the adopted Plan. Therefore, it is the Council's view that all policies are considered to be strategic policies.

12.4 The assessment table of policies against the Local Plan objectives and the priorities/criteria in NPPF paragraph 20, is appended at Appendix 1.

Q.13 The modified strategic policies of the Plan would cover the period to 2029, and consequently will not look ahead over a minimum of 15 years from adoption as per NPPF paragraph 22. What is the justification for this, and is the Plan positively prepared in this regard?

B&NES Response:

13.1 The justification for the strategic policies not looking ahead a minimum of 15 years is explained in the council's response to the Inspector's initial questions [EXAM1A Q.12](#). In summary the LPPU has a limited scope and helps 'bridge the gap' to address urgent issues such as responding to the Council's climate and ecological emergency declarations in advance of a full 'new' Local Plan being prepared that is anticipated will cover the period from 2022 to 2042. Preparation of the new Local Plan will formally commence later this year with publication of a launch document. In addition, the LPPU policies have been updated to ensure alignment with NPPF 2021. This ensures that whilst the strategic policies do not look ahead a minimum of 15 years they are aligned with current national policy. As such they will form a sound and appropriate basis for decision-making up to 2029. The LPPU policies will then be replaced by policies in the new Local Plan upon its adoption, currently scheduled to be in late 2024. It is the Council's view that this proactive approach is justified and the Plan is positively prepared.

Appendix 1

Bath & North East Somerset LPPU

The assessment of the Local Plan policies against the NPPF paragraph 20 strategic requirements and Local Plan strategic objectives.

<u>Volume 1 - District-wide Strategy and Policies</u>	Assessment: NPPF Paragraph 20	Assessment: Local Plan Objectives
District-Wide Strategy DW1 District-wide spatial Strategy RA1 Development in the villages meeting the listed criteria RA2 Development in villages outside the Green Belt not meeting Policy RA1 criteria	Paragraph 20 (a); (b); (c); (d)	Objectives 1 – 7
SD1 Presumption in favour of Sustainable Development	Paragraph 20 (a); (b); (c); (d)	Objectives 1 – 7
Responding to Climate Change CP1 Retrofitting Existing Buildings CP3 Renewable Energy SCR2 Roof Mounted/Building Integrated Scale Solar PV SCR4 Community Renewable Energy Schemes SCR5 Water Efficiency SCR6 Sustainable Construction Policy for New Build Residential Development SCR7 Sustainable Construction Policy for New Build Non-Residential Buildings SCR8 Embodied Carbon SCR9 Electric vehicles charging infrastructure CP4 District Heating CP5 Flood Risk Management PMP:SU1 Sustainable Drainage	Paragraph 20 (d)	Objectives 1 - 7
Environmental Quality CP6 Environmental Quality	Paragraph 20 (d)	Objective 2
High Quality Design D.1 General Urban Design Principles D.2 Local Character & Distinctiveness D.3 Urban Fabric D.4 Streets and Spaces D.5 Building Design D.6 Amenity D.7 Infill & Backland Development D.8 Lighting D.9 Advertisements & Outdoor Street Furniture D.10 Public Realm	Paragraph 20 (a); (b); (c); (d)	Objectives 1 - 7

Historic Environment HE1 Historic Environment HE2 Somersetshire Coal Canal and the Wansdyke	Paragraph 20 (d)	Objectives 2 & 4
Landscape NE2 Conserving and Enhancing the Landscape And Landscape Character NE2A Landscape setting of settlements NE2B Extension of residential curtilages in the countryside	Paragraph 20 (d)	Objectives 2, 4 &5
Nature Conservation NE3 Sites, Habitats and Species NE3a Biodiversity Net Gain NE4 Ecosystem Services NE5 Ecological Networks and Nature Recovery NE6 Trees and woodland conservation	Paragraph 20 (d)	Objectives 1, 2 &6
Green Infrastructure CP7 Green Infrastructure NE1 Development and Green Infrastructure	Paragraph 20 (d)	Objectives 1, 2 &6
Green Belt CP8 Green Belt GB1 Visual amenities of the Green Belt GB2 Development in Green Belt villages GB3 Extensions and alterations buildings in the Green Belt	Paragraph 20 (d)	Objectives 2 & 4
Pollution, contamination, and safety PCS1 Pollution and nuisance PCS2 Noise and vibration PCS3 Air quality PCS4 Hazardous substances PCS5 Contamination PCS6 Unstable land PCS7 Water Source Protection Zones PCS7A Foul sewage infrastructure PCS8 Bath Hot Springs	Paragraph 20 (d)	Objectives 2,3 & 6
Meeting Housing Needs CP9 Affordable Housing RA4 Rural Exceptions Sites H1 Housing and Facilities for the Elderly, people with other Supported Housing or Care Needs CP10 Housing Mix H2 Houses in Multiple Occupation H2A: Purpose Built Student Accommodation H3 Residential Use in Existing Buildings H4 Self-Build	Paragraph 20 (a)	Objectives 5 & 6

<p>H5 Retention of Existing Housing Stock H6 Moorings H7 Housing accessibility H8 Affordable Housing Regeneration Schemes CP11 Gypsies, Travellers and Travelling Showpeople</p>		
<p>Meeting local community and recreational needs LCR1 Safeguarding local community facilities RA3 Community Facilities and Shops LCR1A Public houses LCR2 New or replacement community facilities LCR3 Sites safeguarded for primary school use PMP:LCR3A Primary school capacity LCR4 Allocation of land for cemeteries LCR5 Safeguarding existing sport and recreational facilities LCR6 New and replacement sports and recreational facilities LCR6A Local Green Spaces LCR7 Recreational development proposals affecting waterways LCR7A Telecommunications development LCR7B Broadband LCR7C Commercial riding establishments LCR8 Protecting allotments LCR9 Increasing the Provision of Local Food Growing</p>	<p>Paragraph 20 (c)</p>	<p>Objectives 1, 2, 3, 4 & 6</p>
<p>Economic Development ED.1A Office Development ED.1B Change of use & redevelopment of office to residential use ED.1C Change of use and redevelopment of office use to other town centre uses ED.2A Strategic (*) and other primary industrial estates ED2B Non-Strategic Industrial Sites</p>	<p>Paragraph 20 (a)</p>	<p>Objectives 1, 3 & 4</p>
<p>Rural Economy RE1 Employment uses in the countryside RE2 Agricultural development RE3 Farm diversification RE4 Essential dwellings for rural workers RE5 Agricultural land RE6 Re-use of rural buildings</p>	<p>Paragraph 20 (a) ; (d)</p>	<p>Objective 1, 3 & 5</p>

RE7 Visitor accommodation		
Retail CP12 Centres and Retailing CR1 Sequential Test CR2 Impact Assessments CR3 Primary Shopping Areas and Primary Shopping Frontages CR4 Dispersed Local Shops	Paragraph 20 (a);(d)	Objectives 2, 3, 4, 6 & 7
Transport ST1 Promoting sustainable travel and Healthy Streets ST2 Sustainable Transport Routes ST2A Active Travel Routes ST3 Transport infrastructure ST4 Rail freight facility ST5 Traffic Management Proposals ST6 Transport Interchange ST7 Transport requirements for managing development ST8 Airport and Aerodrome Safeguarding Areas	Paragraph 20 (b)	Objectives 1-7
Minerals CP8a Minerals M1 Mineral Safeguarding Areas M2 Minerals Allocations M3 Aggregate Recycling Facilities M4 Winning and working of minerals M5 Conventional & Unconventional Hydrocarbons	Paragraph 20 (b); (d)	Objectives 1 & 2
Infrastructure CP13 Infrastructure Provision	Paragraph 20 (b); (c)	Objectives 1-7
Volume 2 - Bath		
B1: Bath Spatial Strategy	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
B4 The World Heritage Site and its setting	Paragraph 20 (d)	Objective 2
BD1: Bath Design Policy	Paragraph 20 (d)	Objectives 2 & 4
B2 Central Area Strategic Policy	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SB1 Development Requirements and Design Principles Walcot Street /Cattlemarket Site	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SB2: Development Requirements and Design Principles Central Riverside & Recreation Ground	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SB3: Development Requirements and Design Principles Manvers Street	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7

SB4 – Bath Quays North & Bath College Development Requirements and Design Principles	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SB5 – South Quays & Riverside Court	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SB6 – South Bank	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SB7 – Green Park Station West & Sydenham Park	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SB8: Western Riverside	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
B3: Strategic Policy for Twerton and Newbridge Riversides	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SB9 – The Bath Press Development Requirements and Design Principles	Paragraph 20 (a); (b); (c); (d)	Objectives 3-7
SB10 – Roseberry Place Development Requirements and Design Principles	Paragraph 20 (a); (b); (c); (d)	Objectives 3-7
SB22 – Locksbrook Creative Industry Hub Development Requirements and Design Principles	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SB23 – Weston Island Development Requirements and Design Principles	Paragraph 20 (a); (b); (c); (d)	Objectives 1, 2, 3, 4, 6 & 7
SB11 – Former MoD Fox Hill Park Development Requirements and Design Principles	Paragraph 20 (a); (b); (c)	Objectives 2, 3, 5 & 6
SB12 Former MoD Warminster Road	Paragraph 20 (a); (b); (c)	Objectives 2, 5 & 6
SB13 Former MoD Ensleigh and Royal High Playing Field (formerly Core Strategy Policy B3c)	Paragraph 20 (a); (b); (c)	Objectives 2, 5 & 6
SB14 Twerton Park Development Requirements and Design Principles	Paragraph 20 (a); (b); (c)	Objectives 1-7
SB15 Hartwells Garage	Paragraph 20 (a)	Objectives 5 & 7
SB16 Burlington Street	Paragraph 20 (a)	Objective 5
SB17 Englishcombe Lane	Paragraph 20 (a);	Objective 5
SB18 Royal United Hospital	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SB24 – Sion Hill Development Requirements and Design Principles	Paragraph 20 (a); (b); (c); (d)	Objectives 1, 2, 5 & 7
SB25 – St Martin’s Hospital Development Requirements and Design Principles	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
B5 Off-Campus Student Accommodation and Teaching Space	Paragraph 20 (a)	Objectives
SB19 University of Bath at Claverton Down	Paragraph 20 (a); (b); (c); (d)	Objectives 1 - 7

SB20 – Bath Spa University, Newton Park Campus	Paragraph 20 (a); (b); (c); (d)	Objectives 2, 3, 5, 6 & 7
SB26 – Park and Ride Sites	Paragraph 20 (a); (b); (c); (d)	Objectives 1, 2, 3, 6 & 7
B3a: Land adjoining Odd Down, Bath Strategic Site Allocation	Paragraph 20 (a); (b); (c); (d)	Objectives 2, 5 & 6
<u>Volume 3 - Keynsham</u>		
KE1: Keynsham Spatial Strategy	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
KE2: Town Centre/Somerdale Strategic Policy	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
KE2a: Somerdale	Paragraph 20 (a); (b); (c); (d)	Objectives 2 -7
KE2b: Riverside and Fire Station Site	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
KE3a: Land adjoining East Keynsham Strategic Site Allocation	Paragraph 20 (a); (b); (c); (d)	Objectives 2-7
KE3c – East of Keynsham – Former Safeguarded Land KE3c	Paragraph 20 (a); (b); (c); (d)	Objectives 1, 2, 4, 5, 6 & 7
KE3d – East of Keynsham Former Safeguarded Land KE3d	Paragraph 20 (a); (b); (c); (d)	Objectives 1, 2, 4, 5, 6 & 7
KE4: Land adjoining South West Keynsham Strategic Site Allocation	Paragraph 20 (a); (b); (c); (d)	Objectives 2, 4, 5 & 6
KE5 –Treetops	Paragraph 20 (d)	Objectives 1, 2, 4, 5, 6 & 7
<u>Volume 4 - Somer Valley</u>		
SV1: Somer Valley Spatial Strategy	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SV2: Midsomer Norton Town Centre Strategic Policy	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SSV1: Policy SSV1 Central High Street Core Site	Paragraph 20 (a); (b); (c); (d)	Objectives 3, 4, 5, 6 & 7
SSV4: Former Welton Manufacturing Site	Paragraph 20 (a); (b); (c); (d)	Objectives 3, 4, 5, 6 & 7
SSV3: Midsomer Norton Town Park	Paragraph 20 (a); (b); (c); (d)	Objectives 1, 2, 4, 5, 6 & 7
SSV21 – Silver Street	Paragraph 20 (a); (b); (c); (d)	Objectives 1, 2, 5, 6 & 7
SV3: Radstock Town Centre Strategic Policy	Paragraph 20 (a); (b); (c); (d)	Objectives 1-7
SSV14: Charlton Timber Yard	Paragraph 20 (a);	Objectives 3, 4 & 5
SSV17: Former Radstock County Infants	Paragraph 20 (a);	Objective 5
SSV20: Former St Nicholas School	Paragraph 20 (a);	Objectives 2 & 5
SSV18: Somer Valley Campus	Paragraph 20 (a);	Objectives 3 & 4
SSV11: St Peter’s Factory site	Paragraph 20 (a);	Objective 5

SSV9: Old Mills Industrial Estate	Paragraph 20 (a); (b); (c); (d)	Objectives 1, 2, 3, 4, 6 &7
SSV22 – Former Paulton Printworks	Paragraph 20 (a); (c);	Objectives 1 - 7
Volume 5 - Rural Areas		
SR24 Land adjacent to Temple Inn Lane, Temple Cloud	Paragraph 20 (a);	Objective 5
SR17 The Former Orchard, Compton Martin	Paragraph 20 (a);	Objective 5
SR5 Pinkers Farm, East Harptree	Paragraph 20 (a);	Objective 5
SR6 Water Street, East Harptree	Paragraph 20 (a);	Objective 5
SR14 Wheelers Manufacturing Block Works, Timsbury	Paragraph 20 (a);	Objective 5
SR15 Land to the East of the St Mary's School, Timsbury	Paragraph 20 (a);	Objective 5
SR2 Leafield, West Harptree	Paragraph 20 (a);	Objective 5
RA5 Land at Whitchurch Strategic Site Allocation	Paragraph 20 (a); (d)	Objectives 2, 5 & 6