

TOWN & COUNTRY PLANNING ACT 1990

**BATH & NORTH EAST SOMERSET LOCAL PLAN
(CORE STRATEGY AND PLACEMAKING PLAN)**

PARTIAL UPDATE

Matter 2: Strategic Policies

Representations on behalf of

LiveWest Limited and J E Sheppard Sons (Sawmills)

21st June 2022

D2 Planning Ref: 018/22

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Q12. 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)?

No comment.

Q13. 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?

The Local Plan Review does not appear to comply with paragraph 22 of the NPPF in that the minimum period for the strategic policies in the Plan will only be at 6 years at best if the Plan is adopted at the end of 2023. We are unclear as to the justification for this as the Council could have prepared a new Local Plan which covered a 15 year period at least. Indeed, they had commenced preparation of a new Local Plan to cover the period to 2036 but subsequently abandoned the Plan in favour of this Review. We would suggest that this is not in line with the advice in the NPPF and that the Council considers this further. Furthermore, not only will this Local Plan Review not cover a minimum 15 year period but it will then take at least a further 3-5 years (possibly longer) to have a new Local Plan in place which will cover a 15 year period. This is particularly the case given that work has halted on the Strategic Development Strategy and there is no indication on the way forward. Therefore it could be seen that the Plan may not have been as positively prepared as possible in this regard.