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Written Statement: Matter 2

Examination of the Bath and North East
Somerset Local Plan Partial Update

On behalf of Vistry Homes

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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)?

The statement at Paragraph 29a is not justified and consistent with national policy as set out in the NPPF and should be deleted from the Plan. Many of the Core and Development Management Policies extend to detailed matters and should be defined as non-strategic policies. By seeking to define all the policies in the Core Strategy and Placemaking Plan as 'strategic' policies the Plan does not provide a clear starting point for any non-strategic policies that are needed.

It is noted that the Council, in their response to the Inspectors initial questions (Q7), have confirmed that a limited number of potential strategic, cross boundary matters during the preparation of the Local Plan Partial Update (LPPU). The Council state that only Policy CP3 on Renewable Energy (CD-SD001, pp.12 to 19) addresses a strategic cross-boundary matter.

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?

The Council state that they are making a LPPU to address a number of urgent issues and will undertake a full review of the Local Plan, alongside the West of England Combined Authority Spatial Development Strategy (SDS) in 2023. However, work on the Spatial Development Strategy (SDS) has been halted and is not being progressed by the West of England Combined Authority. Metro Mayor Dan Norris has written to the Department for Levelling Up, Housing and Communities to explain that he has asked officers to stop work as unanimous agreement on the plan by the councils has not been reached.

In the Topic Paper: Housing Requirement and Housing Supply (CD-SD026) states:

“To address any unmet need or extend the plan-period through the partial update, would undermine and prejudice the work being progressed through the SDS. The LPPU is therefore a proactive approach to meeting the existing shortfall in the Core Strategy plan period in a plan led way whilst the SDS is being prepared, rather than simply waiting for the SDS and new Local Plan to be adopted.”

In light of the decision to halt work on the SDS, there is no justification for a LPPU that covers such a short period and is so limited in scope. In our view, the LPPU is not positively prepared in this regard and the Council should withdraw it from examination and commence a Full Local Plan Review.