

Bath & North East Somerset

Local Plan (Core Strategy /Placemaking Plan) 2011-2029

Partial Update

Submission

Dec 2021

**Topic Paper: Purpose and Scope of the Local
Plan Partial Update**

**Bath & North East
Somerset Council**

Improving People's Lives

1. Introduction

- 1.1 This Topic Paper briefly sets out the purpose of the Local Plan Partial Update (LPPU), why it has been prepared, its scope and approach. In so doing it also outlines the relationship of the LPPU with longer term plan-making in B&NES, through the West of England Combined Authority (WECA) Spatial Development Strategy and new Local Plan for B&NES. It should be read in conjunction with the Topic Paper on Housing Requirement and Housing Supply.

2. LPPU Purpose and Scope

- 2.1 The Council's adopted Local Plan comprises two Development Plan Documents. The Core Strategy (adopted in July 2014) and the Placemaking Plan (adopted in July 2017). The Core Strategy established the housing and job growth requirements to be planned for from 2011-2029; the spatial strategy for accommodating the growth; allocated some strategic sites for development; and established some high level district-wide core policies. The Placemaking Plan was prepared in the context of and to facilitate delivery of the Core Strategy through a range of site allocations and detailed district-wide Development Management policies.
- 2.2 NPPF para 33 requires that local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. It states that reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. The NPPG (paragraph: 062 Reference ID: 61-062-20190315) advises that plan review should be proportionate to the issues in hand and it can then updated in whole or in part. The NPPG (para 065 Reference ID: 61-065-20190723) also provides a steer on the kind of issues that local authorities should consider when determining whether policies should be updated.
- 2.3 B&NES undertook a review of the Local Plan in 2020* and concluded that a number of policies needed to be updated. In particular, the Council declared a Climate Emergency in March 2019 and an Ecological Emergency in July 2019 both of which have implications for planning policy. An update to the Local Plan began alongside the West of England Joint Spatial Plan (JSP) but this ceased in light of the withdrawal of the JSP. Work on a new Local Plan has resumed alongside the West of England Combined Authority (WECA) Spatial Development Strategy (SDS) – see para 3.2 below. In the meantime, in light of the need to ensure a Plan-led approach and that the plan remains effective, and the Government's requirement for up-to-date plans to be in place by 2023,

the Council began a partial update of the Local Plan to address the policies most urgently in need of change. The Council also took account of the advice in the PAS Local Plan Route Mapper on whether a Partial Update was appropriate in the B&NES context.

**The initial 5 year review was undertaken within the context of the preparation of the West of England Joint Spatial Plan which was subsequently withdrawn – see section 3 below*

2.4 The LPPU updates elements of the Core Strategy and Placemaking Plan and has been prepared in order to address some urgent issues within B&NES. In summary these are:

- Ensuring the Local Plan policy framework better helps to address the Council's declared climate and ecological emergencies, including policies on renewable energy generation, retrofitting, sustainable construction and biodiversity net gain,
- Further encouraging sustainable travel in line with the climate emergency through updating transport and travel policies, reviewing the role of the Bath Park & Ride sites and reviewing parking standards for new development (to be defined in a separate Transport & Development Supplementary Planning Document)
- Replenishing the supply of housing in order to ensure that the requirement for additional housing is met and that an ongoing supply of housing is maintained
- The approach to Houses in Multiple Occupation (HMOs), student accommodation, development on the University campuses
- The supply of employment land and the role of city & town centres in light of green recovery objectives
- Ensuring policies are consistent with current national policy as set out in the NPPF 2021 and other relevant legislation

2.5 The scope of the LPPU is therefore, confined to updating those parts of the Core Strategy & Placemaking Plan to address the urgent issues set out above. It is not a new Local Plan. As such it is appropriate that it retains the same plan-period (up to 2029), as well as the same spatial objectives and spatial strategy. In particular, the Plan's overarching objective 'to pursue a low carbon and sustainable future in a changing climate' remains relevant. Following review of the Core Strategy housing requirement it is considered that this remains an appropriate basis for plan-making up to 2029 or until superseded by the New Local Plan (as set out in greater detail in the Housing Requirement and Housing Supply Topic Paper, CD-SD026).

- 2.6 The purpose and scope of the LPPU has been clearly set out at each preparation stage and has been subject to public consultation, including the Commencement document (April-June 2020), Options document (January-February 2021) and Publication version (August-October 2021).

3. Relationship to longer-term Plans

- 3.1 The Council is required to review the Local Plan at least every five years. At the examination of the Core Strategy there were discussions regarding the review of the Plan and the need to consider and address any unmet housing need from Bristol. The examining Planning Inspector noted and required that this should be address through a timely plan-review aligned with those of the other West of England authorities. Policy DW1 in the Core Strategy therefore, references the first review of the plan being timed to co-ordinate with the review of the other West of England Core Strategies.
- 3.2 Review of the housing requirement and consideration of how best to meet any unmet need from Bristol across the sub-region is most appropriately undertaken through the preparation of a sub-regional plan. The four West of England Unitary Authorities (B&NES, Bristol City Council, North Somerset Council and South Gloucestershire Council) prepared a West of England Joint Spatial Plan (JSP) addressing this issue. Allied to the preparation of the JSP B&NES Council started preparation of a Local Plan (covering a plan period from 2016 to 2036) including an options consultation under Regulation 18 in winter 2018. However, the JSP was withdrawn during its examination and therefore, work also ceased on the B&NES Local Plan 2016-2036.
- 3.3 In line with national policy and legislation the West of England Combined Authority (WECA) is preparing a Mayoral Spatial Development Strategy (SDS). The SDS will establish a longer-term housing requirement for the WECA area (covering B&NES, Bristol City Council and South Gloucestershire and a plan period of 2022-2042), a distribution across the three Unitary Authorities (UAs) and a spatial strategy for accommodating it. This will encompass quantifying and establishing a strategy for addressing any unmet need from Bristol. It would not be appropriate for the LPPU to either amend the housing requirement or extend the plan period as this would pre-empt or prejudice the SDS process.
- 3.4 In addition to setting the housing requirement the SDS will also establish economic growth requirements for the WECA area and the constituent UAs, as well as a strategic policy framework covering issues such as climate change and the natural environment. B&NES will prepare a new Local Plan, also covering a plan period of 2022-2042 in the context of and to deliver the SDS.

- 3.5 WECA's programme for the SDS is that it is published (or adopted) in 2023, with the draft anticipated to be published for a statutory 12-weeks consultation in spring 2022. Work on the new Local Plan for B&NES will progress in 2022 and is programmed to be adopted in 2024. The preparation programmes for both the SDS and new Local Plan are set out in the Council's published [Local Development Scheme](#).
- 3.6 In the meantime and in order to address the urgent issues identified in section 2 above the Council is undertaking the LPPU. The LPPU addresses a future housing supply shortfall towards the end of the plan period and increases the supply of housing in a plan-led way in advance of the adoption of the SDS and the new Local Plan. Effectively it bridges the gap and helps to maintain an ongoing supply of additional housing. No delays in the preparation of the SDS or new Local Plan for B&NES are currently anticipated, however, the LPPU also helps to mitigate the risk of any such delay.
- 3.7 Housing delivered as result of the LPPU will also contribute to meeting the housing requirement established by the SDS. As set out in greater detail below housing will be brought forward by the LPPU on both existing and newly allocated sites, which are in sustainable locations and are mainly brownfield in nature in line with the adopted spatial strategy in the Core Strategy.
- 3.8 B&NES Council has engaged with the adjoining authorities within the WECA area in preparing the LPPU and both Bristol City Council and South Gloucestershire Council are supportive of the approach taken in the LPPU. In light of the constrained scope of the LPPU, they have not raised any concerns either informally or formally through comments at the key preparations stages that the LPPU might pre-empt or prejudice decisions taken through the SDS (see Statement of Common Ground with South Gloucestershire Council – CD-SD032).
- 3.9 Other policies in the LPPU, both new policies and updates to existing policies in the adopted Core Strategy and Placemaking Plan, will reflect current national policy and other legislation. They will also ensure that the Local Plan policy framework better address the Climate and Ecological emergencies. Whilst the LPPU policies will be reviewed again through the preparation of the new Local Plan it is likely that some (if not most) will align with the emerging longer term objectives of the SDS and government policy. In effect the LPPU policies can be seen as a stepping-stone towards the policy framework to be established in the new Local Plan.

4. Spatial Strategy Approach to Housing Provision

- 4.1 The LPPU replenishes the supply of housing in a plan-led manner on identified sites. This comprises some additional supply on sites already allocated in the Placemaking Plan, as well as some new site allocations. For the reasons set out above this is a partial update of the Local Plan and so the spatial strategy remains unchanged and the identification of additional supply follows the existing spatial strategy of the Core Strategy and Placemaking Plan.
- 4.2 In line with national policy the Core Strategy and Placemaking Plan prioritise the development of brownfield sites and focus residential development at Bath (as the main centre of employment and services & facilities), followed by Keynsham as the next most sustainable location within the District. Some residential development is directed towards the Somer Valley (although it is primarily restricted to that which was already committed through planning permissions or allocations in previous Local Plans in light of the need for consolidation that part of the district). Limited residential development is directed to the rural areas, focussing primarily on the more sustainable villages with key local services and facilities and better public transport accessibility to the main centres. The exception to this approach was the village of Whitchurch, which was identified in the Core Strategy for a more significant scale of development given its close proximity to the city of Bristol. Whitchurch is tightly surrounded by the Green Belt and the allocation of land in the Core Strategy for residential development required land to be removed from the Green Belt.
- 4.3 The spatial strategy sequence used in distributing housing in the Core Strategy and used as the basis for allocating sites in the Placemaking Plan is informed by the Sustainability Appraisal of the Core Strategy and is outlined in Annex 1 of the Council Report on Changes to the Core Strategy, 4th March 2013, in particular section 4 of the Annex (see CD-GEN004).
- 4.3 As a result, the sites identified in the LPPU are primarily brownfield sites, mainly within Bath, along with two in Keynsham and one in the Somer Valley. In addition to the brownfield sites the land previously removed from the Green Belt in the Core Strategy and safeguarded for development to the east of Keynsham is now allocated for development. The two smaller sites identified and allocated in the Somer Valley are both already committed for development. These two sites are the Former Paulton Printing Factory site which is a brownfield site and comprises a change to undelivered parts of a larger site allocated in the B&NES Local Plan (2007) with the benefit of outline

planning permission and a modest greenfield site at Silver Street in Midsomer Norton which is adjacent to recent residential and primary school development and now also has the benefit of planning permission.

- 4.4 The sites identified in the Draft LPPU will deliver around 1,200 dwellings during the plan period, thereby addressing the established shortfall with a degree of flexibility. As such alternative greenfield sites elsewhere in the District and not complying with the strategy sequence outlined above (including land within the Green Belt) did not need to be considered for allocation.