



Document Control

Project Name:	Duchy of Cornwall
Project Reference:	CP0003
Report Title:	Matter 2 EiP Statement
Doc Reference:	220522_CP0003_EiP_M2

	Name	Position	Signature	Date
Prepared by:	C Danks	Director		
Approved by:	A Tildesley	Director	<i>AT</i>	30.05.22

For and on behalf of Copperfield L&P Ltd

Revision	Date	Notes	Prepared	Approved
-	-	-	-	-

This report and the content herein have been prepared by Copperfield L&P Ltd for the client and project described in the particulars of the instruction.

This report has been prepared in accordance with the professional services appointment related to the project.

Unless by written consent of Copperfield L&P Ltd it should not be relied upon by any third party beyond the instructing client. Copperfield L&P Ltd accepts no duty or responsibility (including negligence) to any party other than the client and disclaims all liability to any such party in respect of this report

1. Matter 2 Strategic Policies

1. Introduction

1. Copperfield is instructed by the Duchy of Cornwall who made representations to the Local Plan Commencement Document in April 2020, the Regulation 18 Document in February 2021 and the Regulation 19 Document in October 2021.
2. This hearing statement reflects the representations previously made and is focused on the Inspectors' MIQs that are relevant or need additional expansion beyond those submissions.
3. The Duchy of Cornwall has land interests to the west of Bath including land between Twerton and Newton St Loe suitable for sustainable development.
4. Set out below are the responses to the relevant MIQs on behalf of the Duchy of Cornwall.

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)?

5. As set out in the Regulation 19 representations of the Duchy of Cornwall, not all the policies of the LPPU appear to be strategic, some are of a development management nature.
6. However, throughout the emerging plan BaNES highlights the importance of responding to climate change and this goes to the heart of the LPPU having declared a climate emergency at a corporate and regional level as a WECA member. As set out in the LPPU, and in the September 2020 West of England Climate Emergency Action Plan, the response to climate change is a strategic policy matter.
7. As the policy response to climate change did form part of the original local plan (and is therefore new to the LPPU), it represents a necessary addition. The Duchy of Cornwall believes this is an important and necessary strategic priority for the LPPU that should remain part of the LPPU amongst others.

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? End 22.05.22

8. Paragraph 22 of the NPPF2021 establishes the need for strategic policies to look ahead over a minimum 15 year period from adoption (except in relation to town centre development) in order to anticipate and respond to long-term requirements and opportunities.



9. As set out in response to Q.12 above, the LPPU contains new strategic policies such as those relating to climate change and as such the plan should address a 15 year time period. It is difficult to see how a plan which addresses a 6 year, short-term time horizon is able to give any certainty to those seeking to deliver housing, commercial social and community infrastructure?
10. With the recent announcement from West of England Combined Authority Major, Dan Norris, that the Spatial Development Strategy (SDS) work has been halted and is not being progressed by WECA, it makes the strategic aspects of the LPPU more important and much less of a 'short-term stop gap' than previously presented. Any suggestion that the LPPU represents a stop gap and therefore justifies a departure from the expectations of paragraph 22 of the NPPF2021 is no longer a reasonable response.
11. Coupled with a halted SDS, and new and amended strategic policies, it is important that the plan looks forward for a full 15 years to guide the development needs of BaNES.

End 22.0522