

BANES LOCAL PLAN PARTIAL UPDATE (LPPU) EXAMINATION
MATTER 2 – STRATEGIC POLICIES

Inspector’s issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission LPPU consultation dated 8 October 2021. This representation answers specific questions as set out in the Inspector’s Matters, Issues & Questions document issued on 14 April 2022.

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

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 approach of the LPPU to strategic policies is inconsistent with national policy for which there is no legitimate justification. As set out in the 2021 NPPF to anticipate and respond to long-term requirements and opportunities, strategic policies should look ahead over a minimum period of 15 years from adoption (para 22). The Council state that the LPPU deals with issues, which are detailed and short term in nature (see EXAM1B Appendix 3 para 9). The HBF contend that newly introduced policies concerning climate change are strategic in nature with a long-term timeframe beyond the LPPU plan period end date of 2029, which is only 7 years away. The West of England Combined Authority has identified climate change as a strategic matter on which joint working will be necessary during the preparation of the West of England Spatial Development Strategy (SDS). The LPPU should not be pre-empting the SDS’s strategic approach to climate change, in this regard the LPPU is not positively prepared.