

South Gloucestershire Council

REPORT TO: CABINET

REPORT TITLE (AND WARD(S)): Update to the South Gloucestershire Council Local Plan Delivery Programme (LPDP) 2022 to 2025

Purpose of Report

1 To consider an update to the Local Plan Delivery Programme (LPDP) which sets out the programme for the preparation and review of the Council's planning policy framework for the next 3 years.

Recommendation

Cabinet is recommended to:

1. Approve the preparation of a new South Gloucestershire Local Plan (SGLP) for the period 2025 to 2042 in accordance with Regulation 18 (1) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

2. Approve the Local Plan Delivery Programme (LPDP) Update, October 2022 – September 2025, as set out in Appendix 1 for publication.

3. Approve the Executive Director of Place, in consultation with the Executive Member for Regeneration, Environment and Strategic Infrastructure, to be given delegated authority to:

- (i) to make editorial amendments to the LPDP before publication; and,
- (ii) approve any necessary and appropriate amendments to the timetable of any documents within the LPDP Update as requested by officers in the Strategic Planning Policy & Specialist Advice Team.

4. Approve the Executive Director Place to work with neighbouring authorities and the West of England Combined Authority (WECA) to co-ordinate and fund the technical work required to deliver the new Local Plan.

Policy

2 Local Authorities are required under the Planning and Compulsory Purchase Act 2004 to keep up to date a three-year rolling work programme for preparing planning policy framework documents. This is referred to in the formal regulations as the Local Development Scheme (LDS), although a simpler description would be the Local Plan Delivery Programme (LPDP). The LPDP sets out the work programme and timetable for preparing the council's Local Plan and supporting planning guidance and documents. This enables local communities, the development industry and others with an interest in the development process to engage in plan preparation with some certainty. Plans must be included in the LPDP and prepared in accordance with the published timetable in order to be found sound at examination. The LPDP can be updated at any time, with the

Government's expectation that it is keep regularly reviewed.

Background

3 The LPDP needs to ensure it supports the Council's objectives and priorities as set out in the Council Plan 2020 with particular responsibility for the following two Council Plan commitments:

Commitment 14: We will promote clean, affordable, high quality design of new and existing communities

Commitment 15: We will plan to join up housing and appropriate infrastructure such as schools and transport networks that make it easier for people to get around, prioritising sustainable and low carbon travel choices.

At the heart of delivering these commitments is the requirement to ensure the Council has an up-to-date Local Plan that sets out the locally determined spatial planning policies for South Gloucestershire. The policies contained in the Local Plan will need to respond to the challenges of delivering future homes, jobs and the infrastructure to support a vibrant and prosperous local economy in accordance with the Council's objectives for creating a new, high quality identity for South Gloucestershire, adapting to a changing climate and supporting nature recovery. As many aspects of land use/ spatial planning cross local authority boundaries, they will also require a strategic cross-boundary approach to be taken. Accordingly, the preparation of an up to date Local Plan will need to ensure it has been undertaken in accordance the Duty to Co-operate.

4 The LDS was last updated in December 2021. Following the decision of the WECA Mayor on 9th May to stop all work on the West of England Combined Authority Spatial Development Strategy (SDS), the strategic planning framework for South Gloucestershire will now be provided through its Local Plan. Accordingly, it will be important for the council to have clearly established its strategic and local policy framework priorities, so it can do everything practically possible to support the council's objectives for delivering sustainable development. Therefore, in accordance with Regulation 18 (1) of the Town and Country Planning (Local Planning) (England) Regulations 2012, the council is reconfirming its intent and commitment to prepare a new Local Plan (SGLP) and for this to be undertaken without delay. The new SGLP will be a development plan document (DPD) covering the whole administrative area of the District for the plan period 2025 to 2042. This is expected to be consistent with the Local Plan periods for Bristol City Council and Bath & North East Somerset Council. The key changes needed to the LPDP are described below along with delegated authority sought to finalise and publish a revised LPDP to cover the next three years to 2025. The timetable proposed seeks to balance the requirement to ensure the council has an up to date Development Plan in place as quickly as possible, while ensuring the necessary regulatory stages and procedures, including the appropriate testing of alternatives through the sustainability appraisal processes is undertaken in order to ensure the Local Plan is demonstrated to be legally and soundly prepared.

The Issues

5 The following local development documents are identified in the LPDP to be prepared/adopted during the period October 2022 to September 2025.

6. South Gloucestershire new Local Plan 2025 to 2042

The new Local Plan, which will replace the growth strategy and strategic policies and key local level policies in the Core Strategy and Policies, Sites and Places Plan. With an aim for it to be published, examined, and adopted by July 2025.

- I. The new Local Plan will commence with **the publishing of the updated LPDP in October 2022** which will reset and launch the Local Plan timetable following WECA stopping all work on the SDS.
- II. This would be followed with the publishing of an initial **Statement of Common Ground in December 2022**. This will demonstrate how the council will work with its neighbouring authorities and key stakeholders to prepare the Local Plan and in so doing meet the Duty to Cooperate.
- III. **In 2023 an informal draft Local Plan (Regulation 18) will be published for consultation in Summer/ Autumn 2023** – to allow for the establishment of the new Council Administration following the May 2023 local elections the timetable window for commencing consultation is between July and October 2023. Consultation to run for 12 weeks.

The new Local Plan consultation in 2023 will present the council's proposed way forward for establishing the Plan's vision, spatial objectives, and priorities. However, the primary task of the next stage of the consultation, as the new Local Plan fills the void of the SDS, is to consult on strategy options for how it intends to identify the number and location of homes and jobs that are needed up to 2042. This will take into account the build out of existing commitments and allocations and how much of the remaining new homes that are needed can sustainably be met from brownfield and regeneration opportunity sites and the infrastructure needed to sustainably support this.

The intention is for the 2023 consultation document to firmly build on and incorporate the key principles, approaches, policies, sites and evidence consulted on and published in the previous informal stages of Local Plan consultation undertaken in 2020/21 and 2022 – the Phase 1 and Phase 2 documents. The feedback received from these, supporting call for sites submitted and range of other evidence prepared to date will also be utilised. Taken together this body of preparatory work has covered the following key parts of our new Local Plan:

- a. Key Issues for plan to address and emerging spatial strategy principles – with adjustment needed for strategic policies and growth strategy now set by our new Local Plan rather than SDS;
- b. Council's key approaches and policy areas required to optimise development and regeneration in urban areas, within market towns and on brownfield land. To achieve 'Urban Lifestyles', including high street regeneration and master planning work at Kingswood and Yate and other opportunities which may come forward;
- c. Council's commitment to supporting a hierarchy of sustainable rural villages, investigating local plan led growth allocation in appropriate rural places and a planning framework for community led growth and change in all rural communities;
- d. Emerging drafts of Strategic policies including: Creating well designed places, Green Infrastructure and the environment, climate change and adaptation. We have also shared initial drafts of more detailed thematic policies & updates to

key local standards e.g. Energy Management in New Development, Renewable & Low Carbon Energy System, Parking Requirements (including Electric Vehicles), managing the impact of takeaway food facilities, range of policies relating to Oldbury new build & decommissioning, Biodiversity Net Gain, Houses in Multiple Occupation, Urban Lifestyles and Density, Biodiversity Net Gain, Rural Exception Sites & Community Led Sites;

- e. Safeguard and enhance a network of Strategic Green Infrastructure Corridors;
- f. Potential approaches to safeguard and facilitate development of renewable energy facilities.

IV. Following this consultation, it is intended to prepare and consult on a **Preferred Spatial Strategy and supporting policy framework (Regulation 19 stage) in May 2024**. This will be the Local Plan the council intends to submit for Examination.

V. Once the Plan is **submitted which is expected to be by August 2024**, the Examination process is led by the Planning Inspectorate.

VI. The council currently considers the **Local Plan Examination will take place in November 2024 ahead of Plan adoption by the middle of 2025**

In presenting this timetable officers have sought to balance the need to ensure a comprehensive Development Plan is in place for South Gloucestershire in the shortest period possible, with complying with the current statutory stages for preparing a local plan, as set out in the Town and Country Planning Regulations 2012 and allow for preparation, commissioning and use of a new extensive evidence base, including work on supporting infrastructure and transport modelling.

Does the scope, content and focus of the new Local Plan need to alter to take forward the work the SDS would have covered?

7. Yes. In a change to the content and focus of future consultations envisioned as part of Phase 1 and Phase 2, our new Local Plan will now need to lead preparation of 'options' to form a growth strategy and these growth options, informed by deliverable sites will become the focus for consultation and testing as the new Local Plan moves forward. To inform generation of strategy options and a preferred approach a considerably larger evidence base needs to be prepared and commissioned along with an increased scale of environmental audits prepared in parallel with the plan's development. South Gloucestershire Council will also now need to lead preparation and coordination of a plan for infrastructure to support the new Local Plan's strategy for growth, working closely with WECA who will be leading strategic transport planning functions. In doing so effective joint working with WECA and other partners will be required particularly regarding the timely delivery and funding of transport infrastructure as this will strongly influence the ability to deliver the Local Plan programme.

8. The primary focus of our new Local Plan will become setting the growth strategy, allocating sites, determining and safeguarding land for supporting infrastructure and setting out where will be protected from development. We also need to prioritise the 'strategic policies relating to growth, affordable housing, strategic design, environment and infrastructure – replacing these aspects of the Core Strategy and PSP Plan. We intend to also include focused local level policies, including those already consulted on at Phase 1 and Phase 2, but with only a very focused number of additional local policies.

9. Given our ambition concerning the pace of delivery of the new Local Plan, and the uplift in resource prioritisation (in relation to staff, budget and evidence needed to take forward the strategic elements), the intention is for the majority of non-strategic policies in the Core Strategy and PSP Plan to be taken forward in a separate Local Plan document, to be commenced after the new Local Plan has been submitted. All policies prepared and adopted via either route will attract the full weight of the statutory development plan. We are also mindful that a significant update to national planning policy and legislation is forthcoming which it is anticipated will be setting a large number of currently local development management policies at a national level.

How WECA stopping all work on the SDS has been taken into account in presenting the timetable for the new Local Plan.

10. Under the WECA Order, strategic planning functions for the WECA area are conferred to the WECA Mayor. The WECA Mayor has the primary responsibility for preparing strategic policies, such as housing policies. To the extent that any policies are prepared by the Mayor, the constituent West of England Combined authorities' power to set out their own strategic policies is excluded, insofar as those policies conflict with the WECA SDS. However, currently there is no WECA SDS and the Mayor has stated that he has instructed his officers to stop all work. In fact the relevant officer team leading this work at WECA has since been effectively disbanded. The absence of a SDS has, in effect, left SGC without up-to-date strategic or housing policies. However, South Gloucestershire as a Local Planning Authority (LPA) under s.17(3) of the Planning and Compulsory Purchase Act 2004 (PCPA), is under a duty to set out, in local development documents¹, policies relating to the development and use of land in their area. Furthermore, section 19 of the PCPA requires LPAs to identify and set out strategic policies in their respective development plan documents.

11. In circumstances such as these, where there is no WECA SDS, the Council must identify the strategic priorities for development in its area and must include those priorities in its development plan policies. Accordingly, South Gloucestershire is required to bring forward its own Local Plan as quickly as possible and for this plan to set out both the local and strategic policy framework to ensure future development is plan-led. To do otherwise would risk the situation of being left with an out-of-date growth strategy to determine how much and where future housing and employment growth would take place and what land might need to be safeguarded for infrastructure to support that growth. Leading to the widespread application of the NPPF tilted balance (where there is no five year supply).

Establishing the Housing Need for South Gloucestershire and cooperation on cross boundary matters

12. The issue of housing need and establishing the housing requirement figure for South Gloucestershire will be addressed by the new Local Plan. Identifying the housing need is intended to be undertaken through a refresh of the West of England Local Housing Needs Assessment (LHNA) which under current Government guidance will be based on the standard methodology figure for the District. The Council will also continue its longstanding history of joint working and cooperation with the other West of England authorities, adjoining local planning authorities, and with other key bodies on strategic, cross boundary matters in preparing the new Local Plan. Accordingly, should any request be received from Bristol City or any other neighbouring council for South Gloucestershire to meet some of its unmet housing need this will be considered through the Duty to Co-

¹ Local development documents consist of both development plan documents and other types of policy document, for example supplementary planning documents. This advice is only concerned with development plan documents.

operate, or any successor arrangement, subject to the Government's proposed planning reforms. Similarly, should South Gloucestershire find itself in the position where it is unable to fully accommodate all its identified needs, our neighbours, through the Duty to Cooperate, will need to be asked in they can assist in meeting this need.

Alternative Local Plan Timetable Options

13. As part of the process of setting a new local plan timetable an alternative option involving a longer time for evidence preparation has also been considered. This would result in the informal draft (Regulation 18) consultation stage of the Local Plan taking place in February/ March 2024, some 7-9 months later than the recommended Local Plan timetable. This would also have the effect of delaying Plan adoption by a similar time period, extending this to December 2025.

14. While this option would have a greater opportunity for robust evidence, particularly more refined sub regional transport modelling and transport infrastructure considerations, to inform options and preferred strategy in one consultation, it would create a significant gap since the local plan consultation was undertaken in 2022 and the next consultation in April 2024. The recommended timetable has the advantage of maintaining momentum building on consultation undertaken in 2021 and 2022. It also ensures the Local Plan maintains a preparation timetable consistent with the Bristol City and B&NES as members of the Combined West of England Authority.

15. Neighbourhood Plans

Currently the council has 3 made (adopted) Neighbourhood Plans covering Oldbury, Thornbury and Charfield. There are currently two Neighbourhood Plans under preparation, with designated neighbourhood plan areas, at Pilning and Severn Beach, and Filton. Separately to this, on the back of recent local plan consultation discussions (as part of the Phase 2 document) which highlighted the ability of communities to take forward locally evidenced and prepared plans for growth and change, several parishes are currently considering preparing a neighbourhood plan. The Council has a duty to support local communities in this work. Accordingly, officers have established liaison arrangements to work with and support local communities undertaking neighbourhood plans.

16. Supplementary Planning Documents (SPDs)

Supplementary planning documents (SPDs) build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration of significant weight in decision-making. To help mitigate the impact of delays created through having to reset the Local Plan timetable, a further targeted number of SPDs in addition to the 10 new SPDs published since 2021 are considered to add further detail to the policies in the adopted development plan while not adding unnecessarily to the financial burdens on development. A list, (which may be subject to change) of the further SPDs to be prepared and why they are considered necessary is set out below. In identifying these two additional SPDs officers are mindful of the need to ensure available resources within the Planning Service is predominately focused on preparing the Council's new Local Plan. Should additional SPDs be identified as required to be prepared for example regarding updating conservation area appraisal and local list of heritage assets or guidance on applying parking standards, given these would not result in changes to the council's adopted planning policies, any revisions to the LPDP to incorporate these SPDs would be agreed with the Cabinet Member and Shared with the Council's Policy Advisory Group (PAG), prior to any republishing of the LPDP.

- Biodiversity and Planning SPD** – The current SPD “South Gloucestershire Design Guide: Biodiversity and the Planning Process” was adopted in October 2005. Although many of the principles remain the same, since its publication new legislation, national and local policy such as the Environment Act (2021), National Planning Policy Framework and the South Gloucestershire Policies, Sites and Places Plan (2017) and Core Strategy(2013) have come into force rendering the publication out of date and in need of an update. The SPD which was subject to consultation between July and September this year, will aim to support adopted development plan policy PSP19 by providing advise on how to maximise biodiversity net gain on a site, retaining and enhancing those habitats identified though the site survey work and incorporating them within the scheme. The SPD will also reference best practise for integration of biodiversity net gain within site design and planning to ensure habitats for wildlife are enhanced, detail what information is required when submitting an application and what is required to achieve a well-designed scheme for biodiversity. In presenting the refreshed LPDP, the SPD timetable has been revised to enable sufficient time to review and prepare responses to the consultation, and for officers to take into account any further regulatory updates to the secondary legislation and policy guidance associated with the 2021 Environment Act which are still be to brought into place.
- Landscape Character Assessment SPD Refresh** - The overarching aim of this SPD is to update and refresh the existing South Gloucestershire Landscape Character Assessment SPD (adopted November 2014). Preparing the SPD enables officers to reflect the latest planning policy, recently adopted SPD guidance, and related background landscape publications and studies; citing relevant South Gloucestershire Climate Change Emergency Change Action Plan, and emerging local nature recovery network strategy (LNRN) objectives; and referencing related council environmental enhancement projects and delivery programmes. The objective is that the revised document will contain sufficient guidance to support and inform the ongoing preparation of the council’s new Local Plan and performing the council’s development management function in terms of supporting the delivery of environmental project work. The timetable for preparing the SPD is set out within the LPDP Refresh at Appendix 1.

17. Community Infrastructure (CIL) Charging Schedule Review - CIL Charging Schedule was adopted on 6th April 2015 and the charging of CIL on planning applications commenced on 1st August 2015. The CIL allows local planning authorities to raise funds from developers who are undertaking new development projects in their area. Where planning permission is granted for a development that is CIL chargeable, CIL is levied as a charge per square metre of net additional floorspace. When CIL was adopted, it was the intention to review it every 3 years. This review was also intended to reflect bringing forward the Council’s new Development Plan and strategic housing requirement and locations for strategic growth in South Gloucestershire it would contain.

18. Notwithstanding the above, the Government have indicated their intention in the new Levelling Up and Regeneration Bill published in May 2022 to abolish S106 Agreements and CIL and replace these with a new locally determined Infrastructure Levy (IL). Furthermore, any future levy charging will need to be considered and aligned with the infrastructure and policy asks arising from the new Local Plan. This will need to be tested as part of a whole plan viability assessment. Therefore, it is likely that in addition to any government reforms to the overall CIL/ IL Charging approach, updates to our charges and understanding of what current CIL/ IL might be spent on, can only really be developed in

parallel or with an understanding of our new Local Plans asks and needs. Accordingly, and recognising the current national policy direction uncertainty which may become clearer over the next 6-12 months, it is proposed to keep the timetable for replacing the Council's CIL under review until the legislative changes are clearer and officers can present a timetable and work programme for replacing the current CIL Charging Schedule with the new Infrastructure Levy.

19. Maintaining an up-to-date Policies Map - to reflect the changing policy framework and to incorporate new spatial mapping constraints and other key datasets, the Council's Policies Map will be updated as appropriate and necessary. As part of our new Local Plan, with appropriate support from the council ICT and consultation teams we will be setting the new local plan, its policies, growth locations, sites and safeguarding as a fully digital document with interactive maps. Moving away from single pdfs and dispersed mapped information.

Consultation

20. Requirements to engage local communities, statutory undertakers and other bodies are embedded in the planning acts and regulations. The production of all planning documents entails public engagement, as set out in the Council's Statement of Community Involvement (SCI) (www.southglos.gov.uk/planningsci). The arrangements for public consultation on each Plan are set out in the LPDP. It is the role and responsibility of South Gloucestershire Cabinet/ Executive Members to set the policy direction and take forward the business of the council. This is the forum for how the policy framework of the Council's Development Plan will be developed and taken forward in accordance with the council's constitution. However, it is also important to ensure appropriate mechanisms are in place to ensure all members are kept informed and have an opportunity to comment on the emerging planning policy framework to be effective in discharging their duty to their constituents. A key forum to achieving this will be through engaging and involving the Policy Advisory Group (PAG), currently attended by members of the Conservative and Liberal Democrat groups, in preparation of the LPDP programme of work. This will be the primary mechanism for ensuring political groups are informed of, and engage in how policy framework is being prepared, particularly regarding the timetable and key stages. It will also enable the impacts of the Government's Planning reforms to be considered and any appropriate adjustments made to the Local Plan and support supplementary and technical documents.

Equalities Considerations

21. By ensuring the LPDP is up to date it enables local communities, the development industry and others with an interest in the development process to engage in plan preparation with some certainty. The Council is aware that people with some Protected Characteristics are disproportionately more likely to experience negative impacts through reduced opportunity to access affordable and adapted housing that meets their needs, access to well paid jobs, opportunities to enjoy recreation opportunities/ access to nature and reduced mobility and ability to travel. We are also increasingly aware that with the impact of climate change these inequalities are likely to widen as sections of our society who are more disadvantaged are more impacted by, for example, incidences of flooding and extreme heat days as they have less resilience and capacity to mitigate the impacts of climate change in the short term and adapt in the longer term, compared to others. Particularly notably, these groups are:

- Younger persons, particularly those living in our priority neighbourhoods

- Disabled People, including people with mental health conditions - given national statistics which indicate that there is greater potential for economic disadvantage amongst this group,
- People from minority ethnic groups (MEG) - in the South West, 70% of white British households own their home versus 40% of MEG. Social renting is particularly high among some ethnic minorities: in 2014–16, 48% of African, 45% of Caribbean and other black and 42% of Bangladeshi households in England rented from a local authority or housing association compared with 16% of white British households. Pakistani, Chinese and Indian households were less likely to rent in the social sector, at 11%, 9% and 7% respectively (Cabinet Office, 2017). Homelessness disproportionately affects ethnic minorities. People from ethnic minorities are at higher risk of homelessness in England.
- LGBTQ+ communities - given national statistics which indicate that there is greater level of homelessness amongst LGBTQ+ communities
- Lone parent households largely headed by women
- Refugees, including victims of trafficking
- Gypsies & Travellers
- Families with children living in poverty

22. In preparing the documents identified in the updated LPDP a range of consultation methods and techniques will be utilised to engage with different stakeholder groups in accordance with the council's SCI. Integral to this, the Council will consult our equalities partners representing people with the Protected Characteristics, including those listed above, as the Local Plan and the other documents that comprise the new LPDP are prepared. The objective of this is to strengthen community and stakeholder involvement and awareness of the role and purpose of the Council's Local Plan and support policy framework documents to ensure the needs of all residents of South Gloucestershire are addressed, thus making a significant contribution to reductions in the inequality gap.

23. The preparation and consultation of Equality Impact Assessment and Analysis (EqIAA) will form part of the Local Plan programme and other policy framework documents as appropriate. This will ensure the Council's commitment to assessing the equalities impacts of its LPDP programme is fully assessed and actions identified to address them.

Alternative Options Considered

24. As explained in the report, the council is required under the Planning and Compulsory Purchase Act 2004 to keep up to date a three year rolling work programme for preparing planning policy framework documents. The council has the option not to proceed with the LPDP update given the stopping of all work on the SDS by the WECA Mayor. However, this would then expose the council to the LPDP being increasingly out of date and failing to reflect the spatial requirements of the council's corporate policy agenda, particularly around its declared Climate Change Emergency and its place making, town centre regeneration and community led design objectives.

25. Some councils have paused work on preparing new Local Plans to await significant updates to the national planning legislation and policy framework, which will impact the way local plans are prepared, targets imposed and nature of policies. However, given the significant elements of the plan consulted on to date in Phase 1 and Phase 2, need to explore options for growth and continue with preparation of key evidence and information, it is considered that the same risks apply to as pausing due to work on the SDS stopping.

Government advice is also clear that local planning authorities should not be seeking to use the current legislative programme as an excuse to pause their plan making activities.

Risk Assessment

26. Risks associated with not having an up-to-date LPDP and how these will be mitigated are set out at paragraphs 24 and 25. Documents in the LPDP contain planning policies which have implications relating to equalities, sustainability, natural environment, planning, public health and equalities, including legal requirements. The management and oversight of risks associated with preparing the new Local Plan will be carefully reviewed through the Department for Place project management procedures and practices.

Financial Implications (includes tax implications such as VAT)

27. To deliver the documents set out in the updated LPDP in accordance with the milestone work programmes set out at Appendix 1 for each DPD/SPD, will require a significant staff resource and budget commitment to ensure this work programme can be resourced. In recognition of the long-term nature of plan making and the peaks and troughs in expenditure as different stages are reached, the Council has made provision for this both through its annual Local Plan studies budget and the local development framework long term reserve financial planning (LDF LTR). As at Quarter 2 2022/23 based on the existing LDF base budget continuing and monies available in the LDF LTR, sufficient budgetary provision is available to resource the LPDP up to the commencement of the Local Plan Examination. Additional funding to enable the Local Plan to progress through its Examination and adoption stages is currently considered to be required. This budgetary pressure is subject to ongoing review.

28. Noting the existing resources agreed by the WECA Committee in April, it is expected there will continue to be a gap in sub-regional planning left by the absence of the SDS. To support local plan delivery, the Unitary Authorities will need to work closely with WECA to co-ordinate and commission relevant technical work that will inform the Local Plans and other strategic regional work, such LTP5.

Nina Philippidis Service Director – Finance & Chief Financial Officer (S151 Officer)
01454 865140

Legal Implications

29. The LPDP is a statutory requirement. Therefore, it is important to keep it under review and regularly updated to demonstrate how the Council is taking forward its policy framework as part of its Local Plan Review. As explained in para 10 and 11 above, in the absence of WECA SDS setting out strategic policies, as a Local Planning Authority (LPA), South Gloucestershire Council under s.17(3) and s19 of the Planning and Compulsory Purchase Act 2004 (PCPA), has a duty to set out, both the local and strategic policy framework to ensure future development is plan-led in local development documents relating to the development and use of land in their area. In the absence of an SDS, it is considered lawful for South Gloucestershire to prepare and adopt strategic policies, including housing policies, in its Local Plan.

Human Resources Implications

30. The staff resources needed to prepare the documents in the LPDP will be drawn in large part from existing staff within the Strategic Planning Policy team. Given the stopping of the SDS and in recognition that the responsibility for strategic as well as local policy preparation is now the responsibility of the Council's Local Plan, additional staff resources by way of two senior planning officers are in the process of being recruited to give additional capacity of the Local Plans Team. Resources needed to prepare the Local Plan will be kept under review.

31. Consultancy support will need to be secured where the necessary capacity and expertise does not exist in-house and or additional specific technical capacity is needed. The team also have the skills to support Neighbourhood Development Plans (NDPs) should any communities wish to bring any forward over the next 2-3 years but beyond a relatively low level of input, this would require a rescheduling of existing work programmes, or additional resource provision to be established.

Gaynor Fisher – Human Resources Business Partner – 01454 868193

Climate Emergency and Environmental Implications

32. Ensuring the Council has a clear timetable for the delivery of the local plan and other documents, strategies and SPDs is crucial in terms of aligning the necessary supporting evidence base to ensure future policies are best able to deliver the Council's Climate and Nature Emergency commitments. As of July 2019 all 4 West of England authorities and the West of England Combined Authority declared Climate Emergencies' committing to area wide carbon neutrality by 2030. South Gloucestershire's approach to the Climate Emergency includes reducing emissions, preparing for the local impacts of a changing climate and to protect and restore nature. The future location of housing, population, jobs and infrastructure has a significant impact on the delivery of these Climate Emergency commitments. The implications of not having an up to date and adopted plan would be likely to increase the negative impacts for both climate and nature, as decisions are less likely to deliver the best potential outcomes when they are made in the absence of a strong local plan. Growth generally increases carbon emissions and puts further pressure on the natural environment; therefore, careful consideration must be given to the elimination of emissions and nature's recovery.

These new policies will have significant implications for nature and communities, in terms of enabling the recovery of our local natural environment and for residents and businesses to lead lives that have minimal environmental impact. It is therefore essential that an up to date development plan and supporting policy framework documents are in place as soon as possible for South Gloucestershire which are consistent with these commitments and ensures that new development is consistent with the 2030 target. Furthermore, given there is only 7 years left until 2030, the timeframe for getting a strategic and local planning framework in place that responds to the Climate Emergency declaration is therefore crucial.

Lucy Rees, Senior Environmental Policy and Climate Change Officer - 01454 862224

Social Implications

33. The council's development plan and supporting policy framework documents has significant implications for a wide range of Council services in terms of, for example, the future location of population, jobs and infrastructure. These factors are essential in supporting individuals, families and communities in reducing inequality of all types and providing the best chances in life and this will need to be considered as the new planning policy documents are developed.

Mark Pullin, Strong, Service Director of Community Development – 01454 868480

Economic Implications

34. There are no direct economic implications identified through the recommendations outlined within this report. The council's development plan and supporting policy framework documents has significant implications for supporting a strong and prosperous economy. These factors are essential in supporting individuals, families and communities in reducing inequality of all types and providing the best chances in life and this will need to be considered as the new planning policy documents are developed.

Ian Steele - 01454 868202

Privacy Impact Assessment

35. In preparing to council's development plan and supporting policy framework documents the council will ensure full consideration to its data protection responsibilities. All relevant and necessary steps, including removing personal contact details from correspondence received and ensuring all parties are advised of how their personal contact information will be used, will be undertaken. Officers are therefore satisfied that any impacts of the Plan itself on specific individuals or groups, will be appropriately addressed.

Patrick Conroy, Strategic Planning Policy and Specialist Advice Team Manager
☎ 01454 863574

Risks, Mitigations & Opportunities

36. The maintenance of an LPDP is a statutory requirement under the Planning and Compulsory Purchase Act 2011. It is the starting point for residents and stakeholders to find out what planning policies relate to their area and how they will be reviewed. Setting out publicly the Development Plan work programme through the LPDP establishes clarity for residents, businesses and other bodies and sets out a clear programme to enable stakeholder engagement at key stages in the process. By publishing the council's new LPDP it is significantly reducing the risk that the council will be challenged for not having an up to date local plan review programme in place.

37. It is also important to demonstrate that the council is undertaking its local plan programme, in accordance with the principles of the Duty to Co-operate (DtC). Failure to engage with our neighbouring local authorities actively, constructively and on an ongoing

basis will make it difficult for the Council to demonstrate to the government that the UAs are delivering robust, strategic planning consistent with the DtC and ultimately the Plan could be found unsound. By setting out a clear commitment to prepare the South Gloucestershire Local Plan to include both strategic and local planning policies, the council is greatly reducing the potential challenge that its plan making programme has failed to comply with the duty to co-operate and that there is no effective mechanism to provide a strategic review of the housing and economic development activity requirements and set site specific allocations or policy designations along with the policy framework needed to support for their delivery. As also explained in this report, the timetables proposed seek to balance and take into account the requirement to ensure the council has an up to date Development Plan and supporting documents in place as quickly as possible while ensuring this is undertaken in a way that is legally and policy sound. Any further impacts which might cause delays to work programmes for example planning reforms and or infrastructure funding and delivery issues, will need to be considered and appropriate adjustments made at that time.

Other Implications

38. The Local Plan and supporting policy framework documents play a key part in delivering the council's corporate ambitions and objectives. It is therefore important that the Plan gives the necessary spatial expression to the council's Corporate Plan. In achieving this it will be important that the Resources and People Departments, as well as the Council's key partners are kept informed and participate in its preparation. This will aim to be achieved through the governance arrangements established to deliver each of the plans and documents included in the council's LPDP as set out at Appendix 1.

39. Taking forward and coordinating all strategic planning through the Local Plan rather than the SDS, including preparation of supporting level of infrastructure and mitigation of growth locations, will require the new Local Plan to be supported by colleagues within other teams across the council, particularly in relation to producing evidence and plans for transport infrastructure, health, education, community facilities and provision of an appropriate level of open space and playing fields.

Reasons for Decision

40. The documents which are set out in the LPDP for 2022 – 2025 reflect the Council's priority to ensure that it has an up to date development plan, both in respect of managing land use change and in applying development management policies. This will ensure the Council minimises its reliance on out of date Local Plans and therefore reducing the risk of planning by appeal where there is no up to date development plan. It also helps to ensure that the Council prioritises and resources its objective to address key issues of: the pressure of housing growth, driving sustainable economic growth, transitioning to a low carbon economy, adopting to a changing climate, supporting nature recovery and maintaining the quality of life for existing and future residents.

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Background Papers

South Gloucestershire Local Development Scheme 2022- 2025

Appendices

Appendix 1 - South Gloucestershire Council Local Plan Delivery Programme (October 2022 – October 2025) Update