

## West of England Joint Spatial Plan - Publication Representation Form

The West of England councils - Bath & North East Somerset, Bristol City, North Somerset and South Gloucestershire councils are inviting representations on the Publication Document of the West of England Joint Spatial Plan. These will be considered by the examining Inspector in the context of the soundness and legal compliance of the Plan.

**Please return this form by Wednesday 10<sup>th</sup> January 2018.**

**Email to:** [comment@jointplanningwofe.org.uk](mailto:comment@jointplanningwofe.org.uk) **or post to:** West of England Joint Spatial Plan, C/o South Gloucestershire Council, Planning, PO Box 1954, Bristol BS37 0DD

**This form has two parts:**

**Part A** – Personal Details

**Part B** – Your representation.

**Please fill in a separate sheet for each representation you wish to make.**

To ensure your representation is restricted to issues of soundness and legal compliance, you are advised to refer to the accompanying **Guidance Document** and make your representation on this official form that has been specifically designed to assist you in making your representation.

**Please be aware that all comments made on the Joint Spatial Plan will be publicly available.**

Anonymous forms cannot be accepted and so to submit your form you must include your details below.

You should refer to section 5 in the Guidance Document for advice on how to make a **joint representation**.

### Part A

#### 1. Personal Details\* 2. Agent's Details (if applicable)

\* If an agent is appointed, complete only the Title, Name and Organisation boxes in 1. below adding the agent's details in 2 below.

Title*	Ms	
First Name*	Sophie	
Last Name*	Spencer	
Job Title (where relevant)	Director	
Organisation* (where relevant)	CPRE Avonside (including CPRE South Gloucestershire District Group, CPRE BANES District Group and CPRE North Somerset District Group)	
Address Line 1	PO Box 1621	
Address Line 2	BRISTOL	
Post Code	BS405YG	
Telephone Number	07854 741130	
E-mail Address	director@cpreavonside.org.uk	

*Sophie Spencer*

Signature

Date 08/01/18

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## Part B - Your Representation

Please use a separate form for each representation made and read the accompanying **Guidance Note** that accompanies this form before you complete it.

**Name or Organisation: CPRE Avonside (Form 1 of 18)**

**Q1. On which part of the Joint Spatial Plan are you commenting? Please see the note above.**

<b>Chapter</b>	1 4 4	<b>Paragraph</b>	2 - -	<b>Policy</b>	- 2 4
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**Key Diagram**

**Q2. Do you consider the Joint Spatial Plan to be:**

<b>Legally compliant?</b>	<b>Yes</b>	<input type="text"/>	<b>No</b>	<input type="text"/>
<b>Sound?</b>	<b>Yes</b>	<input type="text"/>	<b>No</b>	<input checked="" type="text"/>
<b>Compliant with the Duty to co-operate?</b>	<b>Yes</b>	<input type="text"/>	<b>No</b>	<input type="text"/>

*Please tick as appropriate*

**Q3. Please give details of why you consider the Joint Spatial Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**  
**If you wish to support the legal compliance or soundness of the Joint Spatial Plan or its compliance with the duty to co-operate, please also use this box to set out your representation.**

**Summary**

The JSP is **unsound because it is not in line with national planning policy** as set out in the NPPF. The use of the terminology 'Statutory development plan document' is misleading. The JSP is a local development document prepared by the local planning authorities in cooperation (Section 5.(1) of the Town and Country Planning Regulations 2012). It is therefore, part of the Local Plan of the LA's involved and as such should be tested for soundness against the NPPF requirements for local plans.

This is particularly significant because the JSP fails "to integrate the assessment and strategies for housing, employment and other uses" (particularly infrastructure) required under paragraph 158 of the NPPF.

Despite the excellent strategic priorities of the plan, the JSPs strategic development locations and employment land requirement are not integrated. TAs demonstrated in Figure 1 below the locations of employment land and strategic development at large distances apart. The provision at the end of Policy 4 that in SDLs new employment land may be identified is insufficient to fulfill the requirement for integration

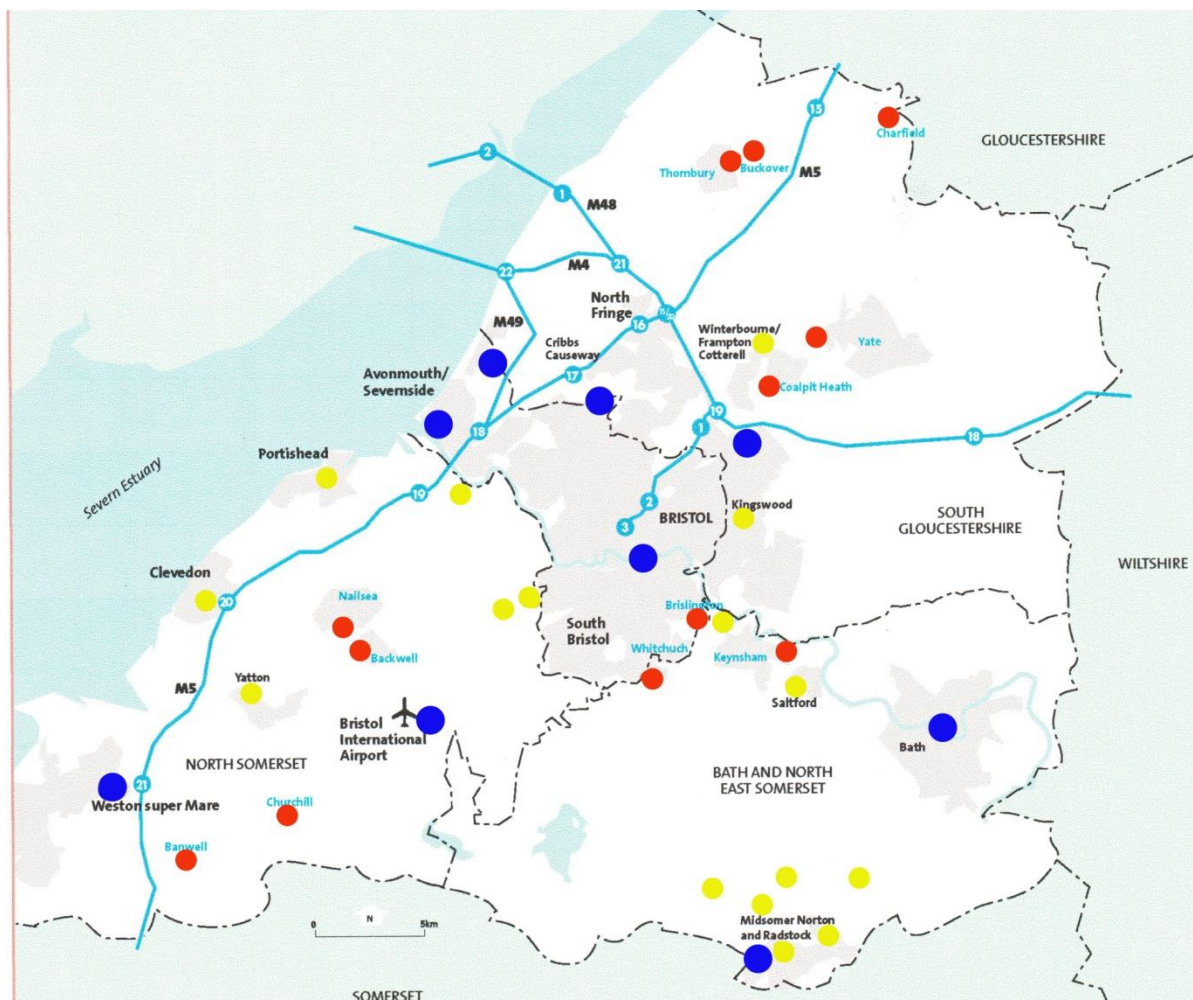
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of housing and employment or lead to the sustainable development of the region. It is therefore **unsound because it is not positively prepared – the plan does not provide new homes and infrastructure in a sustainable way.**

The need for additional infrastructure, in particular roads (as there is unrealistic expectations of the role of railways within the plan) in order for people to travel between locations for work and employment renders the JSP unable to meet its own strategic priorities (see figures 1 and 2 below). Instead the JSP will create greater congestion, air pollution and impact to the valued landscape across the sub-region. It requires people to spend more time in vehicles and at greater cost to them both financially and in terms of their well-being. **It is therefore unsound because it is not justified (it does not set out the best way to meet the needs of the sub-region) and it is not effective (it will not deliver it's own vision).**

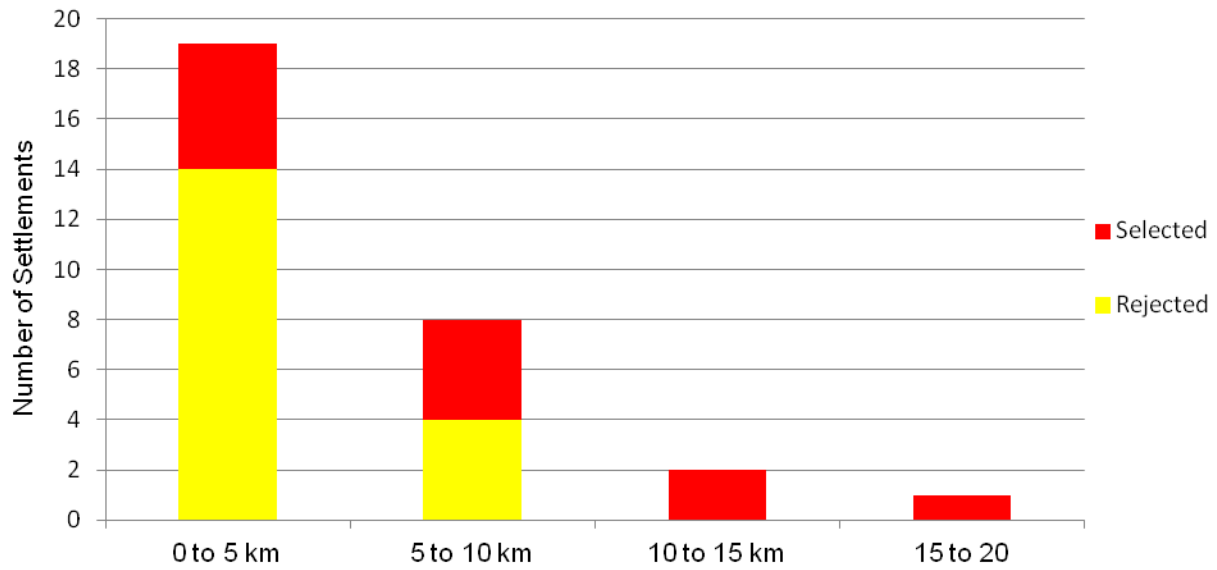
**Figure 1. This image demonstrates the failure to integrate the strategies for employment and housing in the JSP.**

- Employment land requirements identified in the JSP
- Strategic development locations identified in the JSP
- Sites rejected for residential growth during the plan process



**Figure 2. Distance (straight line) to nearest strategic employment location**

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*Please continue on a separate sheet/expand box if necessary*

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**Q4. Please set out what modification(s) you consider necessary to make the Joint Spatial Plan legally compliant or sound, having regard to the matter you have identified at Q3 above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at Examination.) You will need to say why this change will make the Joint Spatial Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

**Recommendation 1:** The JSP should be revised to integrate strategies for housing and employment by seeking to locate them in closer geographical proximity if not the same location and promote greater density and regeneration in the urban areas of the sub-region to reduce the need to travel.

**Recommendation 2:** The JSP should be revised using more realistic forecasts of growth in the region. Specifically, there should not be a rush to develop housing in the unsustainable locations the JSP identifies (detail of the reasons why these locations are unsustainable can be found in our submission relating to Policy 7). New housing and employment should be integrated and there should be greater focus on the opportunities to develop in our existing urban areas in order to encourage regeneration and integrate employment and housing.

*Please continue on a separate sheet/expand box if necessary*

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**Q5. If your representation is seeking modification, do you consider it necessary to participate at the oral part of the Examination?**

**No**, I do not wish to participate at the examination hearings

**Yes**, I wish to participate at the examination hearings

**Q6. If you wish to participate, please outline why you consider this to be necessary.**

Our comments demonstrate significant failures of the JSP to meet the tests of soundness which should be explored further in any examination hearing. CPRE Avonside is the local branch of a respected national charity. We anticipate that the Planning Inspectorate will know CPRE by reputation and value the input of our knowledge and understanding of the issues and local area to be explored in this important process.

*Please continue on a separate sheet/expand box if necessary*

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination.

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Name

Spine Spencer

Date

08/01/18

All representations must be received no later than Wednesday 10<sup>th</sup> January 2018  
Please keep a copy of this form for future reference.