

## 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)	
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*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 5 of 18)

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

Chapter	<input type="text" value="3"/> <input type="text" value="3"/> <input type="text" value="4"/> <input type="text" value="4"/>	Paragraph	<input type="text" value="9"/> <input type="text" value="22"/> <input type="text" value="9"/> <input type="text" value="15"/>	Policy	<input type="text" value="-"/> <input type="text" value="-"/> <input type="text" value="-"/> <input type="text" value="-"/>
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Key Diagram

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

Legally compliant?	Yes	<input type="text"/>	No	<input type="text"/>
Sound?	Yes	<input type="text"/>	No	<input checked="" type="text"/>
Compliant with the Duty to co-operate?	Yes	<input type="text"/>	No	<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 effective. The approach taken in identifying strategic development sites prevents optimisation of brownfield sites in the urban areas across the sub-region. The JSP is also unsound because it is not justified. There is no adequate phasing of supply in the Housing Topic Paper, which means there is no mechanism to realise the Strategic Priorities.

### Detail

We support the approach outlined in this paragraph, except that, without a hierarchy of sites, the JSP as it stands will not be able to deliver high quality development that optimises land use. Currently Bristol and Bath are reasonably good examples of high density urban living, but Yate and Weston, for example, have the capacity to increase density. It is essential that the policy principles are applied to these towns, as well as to Bristol and Bath. We would also like to see more evidence that the JSP is considering

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regenerating areas of low density, low quality housing, and replacing it with high quality; higher density housing that improves the character of the built environment. High density need not mean tower blocks and no green space. We support John Penrose's call for higher density development in Weston which would, for example, be suitable for more mixed use development, including mansion blocks and housing above shops.

Every local planning authority is due to publish an accurate and up-to-date Brownfield Register by 31 December 2017, which will be used by developers and community groups looking to find land on which to build homes. Less than 4% of the current land registered in Britain is on small brownfield sites. Such sites can accommodate housing developments of up to 10 homes, so if councils were to meet the Chancellor's 20% proposal, land for an additional 200,000 homes across England could be unlocked. Local authorities routinely disregard small brownfield sites, citing reasons such as: lack of local authority resources to identify small brownfield sites; perception among builders that the planning system is too burdensome and complex when considering small sites; and lack of transparency in the way that land data is collected, which discourages participation from different sectors, including the local community. CPRE supports a 'brownfield first' policy, which prioritises brownfield sites for development over greenfield. We are calling on the Government to:

- amend brownfield policy and guidance to encourage the identification of the full range of appropriate brownfield sites for housing, including small sites, and
- fulfil its commitment to open up the Land Registry.

We want to see all local authorities in the West of England engage more widely to raise the profile of the brownfield registers. We are concerned that in the most recent update to the brownfield registers for the four local authorities, identified capacity has fallen from 22,000 dwellings in 2016 to 16,000 at the beginning of 2018. Although Bristol has a comparatively good record of building on brownfield sites, and was in the pilot for the brownfield registers, we believe that there are currently unidentified sites available in both Bristol and elsewhere. In particular, BNES and Bristol have identified proportionately far more (by 2 or 3 times) development on small sites compared to North Somerset or South Gloucestershire, suggesting that there is more scope to identify small sites in the latter two areas. Our research with the University of the West of England demonstrates that brownfield land is a renewable resource, which the JSP fails to recognise (CPRE/UWE, From Wasted Spaces to Living Spaces, 2014). Again, the JSP needs a policy to prioritise housing on suitable brownfield sites before greenfield, so that new brownfield sites can be developed as they become available.

CPRE Avonside has been consistent in our call for a clear sequential test and phasing within the JSP. We believe that in order to fulfil the Strategic Priorities, the plan must be able to deliver housing on the most suitable urban brownfield sites first. These meet all the strategic priorities by being the most suitable for provision of affordable housing, as they are normally sited where the particular need occurs. They offer the opportunity to deliver suitable sustainable transport solutions without prohibitive cost, and protect precious countryside from being developed before it is absolutely necessary. We are disappointed that the JSP contains no indication of a hierarchy of areas, prioritising the high density opportunities in cities and major towns which have less landscape impact, and are more sustainable in terms of amenities and access to transport. Leeds City Council is a good example of where such as 'phasing' approach has been followed since the National Planning Policy Framework (NPPF) came into force in 2012.

*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 8:** The JSP should require further work on the brownfield registers in the four authorities and prioritise the use of these sites before any building begins in the countryside. Also it should recognise that these registers are not static and that more brownfield land will become available during the lifetime of the plan. There should be a commitment to regenerating these as and when they become available rather than allowing them to deteriorate or an area degrade as a result. Opportunities to regenerate, increase density and improve the urban environment should be part of this approach.

**Recommendation 9:** The JSP should contain an indication of a hierarchy of areas, prioritising the high density opportunities in cities and major towns which have less landscape impact, and are more sustainable in terms of amenities and access to transport. We need clear phasing with indicative trajectories put into policy.

*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.

**Name**

**Date**

**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.**