

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 10th January 2018.

Email to: 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	
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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 8 of 18)

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

Chapter Paragraph Policy

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 justified and not in line with government policy. There is no explanation regarding the requirements of a garden village and the proposals for those described as such under the strategic locations do not meet any of the expectations we have for such a site.

Details

It is unclear that the strategic settlements outlined in the JSP as 'garden villages' actually meet the Government's intention of a garden village. Lord Matthew Taylor's Report – '*Empowering Localism to Solve the Housing Crisis*'; commissioned by Government laid out why people so vehemently oppose new building and how high land prices are the driver of high density, poor quality, unaffordable houses and inadequate infrastructure. His solution was to capture the uplift in land prices for the new community leading to lower house prices and better infrastructure.

The Department for Communities and Local Government Policy Paper, published in 2016 entitled, '*Locally-led garden villages, towns and cities*' required that they be free standing settlements that work as

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self-sustaining places not dormitory suburbs, meeting local housing need and able to demonstrate both local and strong political, support.

In early 2017 the Government announced its intention to create 14 new garden villages in England, of between 1,500 to 10,000 houses, and three new garden towns in Aylesbury, Taunton and Harlow & Gilston. None of the garden villages in the JSP are listed as amongst those 14. We also questions whether they are in reality distinct new settlements, rather than just extensions to existing urban areas, nor whether they can sustain the infrastructure and transport that would allow them to become self-sufficient in the West of England, which already has high pressure on roads, schools, medical facilities and other services and infrastructure.

CPRE welcomes efforts to tackle the need for housing in the form of high quality, well-planned and well-located developments. Done well with genuine local consent, garden villages and garden towns can be part of the solution and certainly preferable to what is currently happening in too many parts of the country - poor quality new estates plonked down on the edge of villages and market towns, in the teeth of local opposition and in defiance of good planning principles. We have looked closely at the specific proposals in the JSP and there is no evidence to suggest that any of the proposed garden villages are supported by local residents. There is a lack of clarity in the JSP as to what constitutes a 'garden village', and how each of the settlements proposed meet that definition. For example, the infrastructure proposed in each case is neither certain nor realistic. These garden villages are likely to be little better than low density, car-dependent sprawl, built to generic private housebuilder designs, and with little or no affordable housing. Many do not respect the Green Belt and other planning designations; and we are not clear that they aim to or can even attempt to meet housing need, particularly the need for genuinely affordable housing for local people. Our conclusion, however, is that these 'garden villages' are a means of satisfying over-ambitious housing targets and a means of accessing national government funding that may be available.

What is more, where communities support new settlements, they should be protected from speculative planning applications for a long time to come. There is nothing in the JSP that suggests that communities who accept well planned, self-sufficient, high quality garden villages that meet the needs of local people, would be protected from speculative planning applications, either now or in the future. These garden villages in the West of England are situated in remote rural locations, the threaten the rural character of this area and it's 'world class environment' (page 4 of the West of England JSP), which brings, as the JSP states, 'substantial economic and community benefits and contributes significantly to the quality of life of residents, visitors and businesses'. Beautiful villages look set to be swallowed up by the urban sprawl of neighbouring towns. In order to meet the Strategic Priorities of the JSP, all emphasis should be on maximising housing development on suitable brownfield land, within our two cities and major towns, improving the public transport option to ensure that new homes do not put further strain on already over-congested roads, and building in schools and health facilities to service new households.

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 10: The JSP needs clear definition of Garden Villages which sets how they will be delivered in line with Government policy; and how each of the proposed Garden Villages, and their locations, meet the Strategic Priorities outlined in the JSP.

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

Sophie Spencer

Date

08/01/18

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