

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	
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

West of England Joint Spatial Plan - Publication Representation Form

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 7 of 17)

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

Chapter	3 (para 15-20) 4 (para 9) 4 (para 11-13)	Paragraph	15-20 9 11-13	Policy	- - -
---------	--	-----------	---------------------	--------	-------------

Key Diagram

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

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

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 it is not in line with Government policy nor its own strategic priorities - there is no evidence of a full Green Belt review so we cannot know that this is the best way to meet the needs and policy requires approach outlined in NPPF.

Details

We are concerned by the numbers of houses that are to be sited on green-field locations and within the Green Belt. The aims of Strategic Priority 4 are, 'To protect and enhance the sub-region's diverse and high quality natural, built and historic environment and secure a net gain in biodiversity. To prioritise development on brown field locations, optimise densities and retain the overall function of the Bristol and Bath Green Belt'. To realise this the plan requires a phased approach, with strong brownfield first policies and place making necessary to deliver priorities without damaging the Green Belt. This is absent from the plan at present.

West of England Joint Spatial Plan - Publication Representation Form

It is vital that a full Green Belt review is undertaken to ensure a strategic approach that consistently assesses the role of and impact on the Green Belt, where the pressures are coming from, and how the Green Belt provides benefits to local communities and the local economy. To date, we are only aware of a Green Belt 'assessment' having been carried out. This is a more piecemeal approach that doesn't have the benefit of a full and formal review of the Green Belt across the West of England, which is essential to ensure land use is 'future proofed' and 'rural proofed'.

Once completed, the Green Belt should be secured for the lifetime of the Plan. Permanence is one of the two essential characteristics of Green Belts, along with openness. Green Belt's permanence is critical to minimising land speculation by developers and encouraging the long-term management of Green Belt land for farming, nature reserves and other natural resources. In policy and practice this has meant that Green Belt boundaries, once set, should endure for at least the typical life of a development plan and, preferably, for longer.

The Green Belt in the West of England is a major environmental asset, and the final Plan should have positive policies to steward and enhance it. The NPPF para 81 states that '*local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land*'. Elsewhere in England, major steps are being taken to revive the 1990s Community Forest programme through the recently announced Northern Forest initiative to plant up to 50 million trees across three Green Belts (North West; South and West Yorkshire; and York) and the land surrounding them. A clear lead from the JSP could similarly enable the revival of the work of the Forest of Avon. The Forest of Avon's area covers 70% of the Green Belt and thus this body is best placed to lead initiatives to enhance the land. Although the West of England Green Belt is in relatively good condition, the fact that no new Local Nature Reserves have been created in the past 8 years (source: CPRE / ADAS, Nature Conservation and Recreational Opportunities in the Green Belt, 2016) suggests that there is scope to do more.

Please continue on a separate sheet/expand box if necessary

West of England Joint Spatial Plan - Publication Representation Form

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 11: Given the scale of Green Belt loss both from roads and housing development proposed in the JSP, we recommend a full Green Belt review should be carried out that looks at the overall purpose of the Green Belt. This should be an overview, rather than the individual assessments that have been carried out so far, which is consistent across all four authorities. It should examine the case for exceptional circumstances, how proposed development locations would meet the plan's Strategic Priorities, and look for opportunities where the Green Belt could be positively enhanced for beneficial use.

Recommendation 12: The JSP should include strategic policies that plan positively to enhance the beneficial use of the Green Belt, as required in the NPPF para 81.

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.

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 10th January 2018

Please keep a copy of this form for future reference.