

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

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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.

The JSP is unsound because it is not positively prepared, justified or effective and it is not in line with national policy. The Strategic Development Locations are inherently unsustainable and can't realistically deliver the Plan's vision or strategic priorities. Transport and infrastructure provisions are not clearly tied up with the key housing and jobs locations; development areas for new homes are not related to employment areas; and finally, a full Green Belt review is needed 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. CPRE Avonside strongly agrees with the strategic priorities of the plan but the JSP fails to realise them. We have commented in more detail on each of these issues already in relation to Chapters 1, 2, 3, and 4 .

1. There has been no integration of housing and employment locations to reduce the need to travel, which is required in the National Planning Policy Framework (NPPF).
2. The process by which the housing numbers have been allocated and distributed across the sub region, and the two Housing Market Areas, is flawed.
3. The numbers of houses required in the plan are over ambitious given recent evidence. This is

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particularly significant because the JSP fails 'to integrate the assessment and strategies for housing, employment and other uses' (particularly infrastructure) or 'take full account of relevant market and economic signals' - both of which are required under paragraph 158 of the NPPF.

4. The numbers of jobs expected to be created is over ambitious given recent evidence and again fails to take account of 'relevant market and economic signals' as required by the NPPF.
5. Infrastructure is not integrated within the plan. Despite commitments to this at various stages, it relies on schemes that are not in place. Locations of development are not adequately supported by public transport, nor likely to ever be so.
6. There is no mechanism by which affordable housing targets can be realised, effectively offering developers a 'get out' clause. This will mean that Policy 3 and Strategic Priority 1 cannot be realised.
7. There is no phasing set out in the Plan to ensure brownfield development is encouraged and developed before green field sites are released. The Plan also considers all brownfield land potential to exhausted and fails to recognise that, as a renewable resource, more brownfield will become available during lifetime of plan, including the potential for change of use of existing buildings, potential for regeneration to increase density in all urban areas, predominantly Weston-super-mare, Bristol and Bath but also within larger villages and towns in the sub-region.
8. The Plan does not clearly define the concept of a 'Garden Village' and provides no way to test whether chosen locations will enable delivery of Policies 5 and 3.
9. The Plan's approach to the assessing of Green Belt locations is flawed. Neither does it contain any positive policies to steward or enhance the Green Belt. There has been no full review of the Avon Green Belt, only individual Green Belt assessments that amount to a piecemeal approach. This is problematic as it considers Green Belt areas in isolation. The NPPF requires, 'local 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.' (para 81 NPPF).
10. The health and wellbeing of the population are effectively being jeopardised by this plan as it does not adequately consider costs to air pollution of plan or development locations, and places strain on existing resources, despite the commitments made in the Strategic Priorities and Policy 5.
11. No phasing is proposed in the plan, yet makes allowances for a unidentified contingency that can be drawn on if nothing comes forward. This risks developers not delivering on identified sites and then be 'rewarded' with the contingency. It is vital that the Plan reflects the determination of Local Authorities to realise their own Strategic Priorities. The process should be completely clear so that developers are focused on building out sites in the Plan, even when they are not achieving the greatest possible profits.
12. The identified Strategic Locations are not sustainable. They do not meet the Plan's own Strategic Objectives. The current infrastructure plans are insufficient or flawed. There is explanation of how the Plan will deliver its own Policies 3 (Affordable Housing) and Policy 5 (Place Shaping Principles).

We have also made separate comments on each of the individual strategic locations contained in the JSP based on local knowledge of those areas and the challenges that they already face.

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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: WECA should reduce the numbers of housing and jobs to be created within the JSP in line with recent economic forecasts and better integrate strategic development locations with strategies to enhance employment in the sub-region. The starting point of the JSP should be the realisation of Policy 5 through the delivery of sustainable housing and employment opportunities, not the continued building of large dormitory housing estates from which residents will have to drive for their every need. To meet its own strategic priorities it should focus and give strength to LA's directing development to the areas that are most sustainable - urban areas (the core areas of Bristol, Bath and Weston-Super-Mare), but also towns and village within the existing boundaries of which measures should deliver regeneration and enhancement of the environment to enable the well-being and better provision of services for the people living there. Planning for investment in infrastructure should bring benefits to all residents of the West of England, not be prioritised for spending on moving people long distances between new and dispersed locations for employment and housing.

Summary:

1. The plan needs to reduce the housing numbers in line with most recent economic forecasts, and integrate employment and housing locations to reduce the need to travel.
2. The plan needs a mechanism for achieving affordable housing targets.
3. There must be a commitment in the Plan that investment in existing public transport, and extending services, will happen in line with housing development and employment in all locations, not afterwards.
4. To meet its own vision and strategic priorities the JSP should identify opportunities to improve existing communities within the sub-region that are in need of affordable and better quality housing, where housing density can be improved and the area regenerated through new employment opportunities and public transport links.

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?

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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 10th January 2018

Please keep a copy of this form for future reference.