

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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Post Code	BS405YG	
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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 8iii 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="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 positively prepared – it does not provide the rights homes and infrastructure in a sustainable way. The proposals outlined for this SDL are **not justified**.

Backwell

This location fails to deliver Strategic Priority 1 as it is unlikely to provide affordable house, nor would people who need affordable housing necessarily chose to live there as they wouldn't want the additional transport costs to access employment and other services.

Backwell is unlikely to reduce reliance on the private care (Strategic Priority 3 – reduction in car dependency) as Public transport links are already insufficient, and a single new bus route will not 'reduce the reliance on car based journeys' (para 27 West of England JSP). Currently the train station is well used and already at capacity. Commuters from Backwell, however, are unlikely to use the train to commute to Bristol as trains from Weston super mare at peak times are already full. There is no indication in the JSP if and how there is to be increase to the train capacity, nor whether there will be

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improvements in local bus services within Backwell which would enable people to get to the train station without using a car. Currently many people drive to the station. How can we ensure that these measures are addressed before any new housing is built? There is nothing in the JSP that guarantees that, even with a train station, that issues with the transport infrastructure at Backwell would be dealt with first.

This strategic development area does not comply with Strategic Priority 2 in the JSP, and does not fulfil the plans intention of 'integrating housing and employment development' (para 27 West of England JSP). There appears to be no priority to promote employment within this strategic development location (nor the others) and Backwell is not an economic growth area. As there are so few employment opportunities in Backwell already (similar to many other strategic locations) people would have to travel for employment.

Using Backwell as one of the strategic development locations would be likely to increase car commuting to Bristol, with subsequent impact on congestion and air pollution. At Backwell, there are also significant landscape issues and flooding issues with the siting of the proposed strategic development location.

For Backwell to work as a strategic development location it needs sufficient employment, and sufficient public transport to service new households, as well as a significant increase in services and maintenance budgets, for example road maintenance, to deal with the increased pressure. The flooding issues and harm to the landscape would remain.

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.

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

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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.