

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 8iv 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**.

Details

Development at Banwell would have a substantial impact on the landscape of North Somerset, and the backdrop the Mendip Hills Area of Outstanding Natural Beauty. This means that it would not be possible to justify it under Strategic Priority 4 'To protect and enhance the sub-region's diverse and high quality natural, built and historic environment'.

Furthermore, it would require the construction of the Banwell Bypass to facilitate the increase in road transport. This would have a further significant, cumulative, impact on the landscape, and would undoubtedly generate a substantial increase in car journeys, therefore failing to deliver Strategic Priority 3 and achieve 'a reduction in car dependency'. There is a significant risk that a new motorway junction would mean the M5 motorway would no longer be a strategic route at that location, but a commuter

West of England Joint Spatial Plan - Publication Representation Form

route. What makes Banwell an even more unsuitable location for a Strategic Development Location is that there is no rail access, nor any prospect of it.

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 Banwell is not an economic growth area. As there are so few employment opportunities in Banwell already (similar to many other strategic locations) people would have to travel for employment. Therefore, using Banwell as one of the strategic development locations would be likely to increase car commuting to Bristol, with subsequent impact on congestion and air pollution. Another significant disadvantage is the likely difficulty in get developers interested in building affordable housing in an area which requires expensive commuting to employment.

We suspect that this location is seen as a 'strategic opportunity' to facilitate the Banwell bypass, and justify a continuous road to the east joining with the A38 at Churchill/Langford and ultimately to facilitate expansion of the airport. It does not comply with the aspirations set out in the JSP's Strategic Priorities or Policies. The location of the airport in a sensitive Green Belt location needs a full and public appraisal, as part of the JSP process that assesses its role and impact on transport in the area. The airport is the cause of lots of compromises which need to be addressed in a separate airport strategy or Impact Assessment that is recognised by the JSP, looking at what, if any, benefits the airport brings to the local area and local economy.

CPRE Avonside would like to see the JSP prioritise development at Weston-super-Mare and west of the M5 before building on a remoter greenfield site at Banwell. The clear advantage of Weston is access to employment, regeneration of areas that currently contain poor quality housing and households in the lowest 10% of deprivation. It provides an opportunity to increase density, in a way that is sensitive to the character of Weston and would bring about well documented benefits of regeneration and opportunity. The Weston Masterplan, which is currently being developed, provides a far superior opportunity to build homes and could increase housing capacity so that there was no need for the extra houses at Banwell.

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: The location of the airport in the Green Belt necessitates a full public appraisal as part of the JSP process.

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 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.

West of England Joint Spatial Plan - Publication Representation Form

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.