

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 8vii 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 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

CPRE Avonside objects to the proposal to use Coalpit Heath as a Strategic Development Location for 1800 houses. This is a Green Belt location and the Greenbelt plays an important role here in keeping two communities distinct, and providing valued green space for the people who live there. It is the countryside next door to where people live, and is highly valued. The VALID local group object to this use of the Greenbelt. A full Greenbelt review should be undertaken before large areas such as this are relinquished. The Greenbelt plays a specific purpose and is an important designation that prevents urban sprawl and encourages regeneration. It is not designated for the quality of landscape or biodiversity but is highly valued in this area for the access it provides to residents, which brings significant health benefits.

In terms of meeting the sustainable transport policies in the JSP, Coalpit Heath is unlikely to meet

West of England Joint Spatial Plan - Publication Representation Form

Strategic Priority 3 and the 'reduction in car dependency'. It already has difficult commuting problems where the ring road is congested. Public transport is not sufficient for current use and neither the JSP nor Joint Transport Study proposes anything that would improve this situation. The proposal of an additional motorway junction and other roads to facilitate the development at Coalpit Heath would most likely aggravate the situation, as research shows new roads generate more traffic (CPRE, *The End of the Road*, 2017). What is more, a new motorway junction at 18a road risks opening up the area to the west for development further compromises the permanence of the Greenbelt.

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: A full Greenbelt review should be undertaken before large areas such as this are relinquished. The Greenbelt plays a specific purpose and is an important designation that prevents urban sprawl and encourages regeneration. It is not designated for the quality of landscape or biodiversity but is highly valued in this area for the access it provides to residents, which brings significant health benefits.

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

West of England Joint Spatial Plan - Publication Representation Form

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.