

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)	
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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 8x 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

The JSP proposes 3,300 new houses for Nailsea by 2036. This is an increase of 50% in the size of what is currently a dormitory town. We are not satisfied that the process of choosing sites has been based on full and detailed information and is consistent across the four authorities. It should be based on the ability of potential sites to meet the Strategic Priorities set out in the JSP, which Nailsea does not.

Nailsea is largely a dormitory, commuter town. There is no real prospect of substantial employment to support the present population, and new residents in the new 3,300 homes will likely be commuters. This again does not meet the policies or Strategic Priorities set out in the JSP itself. The homes are unlikely to meet the need for affordable housing in the area, as they require costly travel to employment sites. The JSP suggests mitigation by way of a MetroBus, which has neither guaranteed delivery nor proven

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effectiveness in producing a modal change away from private cars. It would not be easy to get the MetroBus to Nailsea without enormous environmental and landscape damage (see CPRE Avonside Representation Form 2 Transport and Infrastructure).

Access to Nailsea by road is a significant negative factor there is no major A road. One access road (a B road) is under a low bridge, and its other surrounding B roads are overloaded country lanes. A 50% increase in population (and cars) would increase difficulties in access. The proposal to build new road from the M5 to link up with new South Bristol Link road would make matters worse. It would encourage drivers to avoid the frequent congestion on the M5 further north to 'skirt' round the south, onto the new South Bristol link with disastrous consequences. Not only are the new roads proposed very expensive, they would cause significant cumulative damage the environment. Any changes to the road infrastructure to increase capacity for Nailsea would impact the Green Belt and, if a new road from Clevedon M5 Junction to the A370 to went ahead, there would be considerable environmental damage to National Trust's Tyntesfield Estate. This area is is a haven of tranquillity for many visitors from West of England and further afield. It would seem that the housing numbers is this location, as in many others in the JSP are justified by huge new road building ambitions. Evidence shows that new roads, as well as being costly and damaging to the environment and landscape, do not bring economic benefits nor do they solve the congestion relief they promise (CPRE, *The End of the Road*, March 2017)

Nailsea/Backwell station might be seen as the saviour in terms of public transport. This would be a mistake. The station is not central to either Nailsea or Backwell and this line has the same issues as other local stations: it is at capacity, and current commuters have difficulty in accessing the train at rush hour due to overcrowding. There are environmental constraints to expanding access, including flooding and existing road infrastructure, which would be require significant change as the rail line goes over a small bridge which crosses the Nailsea/Backwell access road, which is a traffic light controlled, single lane road, under the rail bridge.

Nailsea does have services, but it doesn't have sufficient to meet the needs of another 3,000+ homes. Car parking is, under normal circumstances, available but an increase in demand would either require considerably more car parking or the loss to the economy of business and social activities to other centres. There would be a significant increase in demand for basic utilities infrastructures such as water, waste water, surface water, sewage, gas, electricity, and telecommunications. What this would mean in terms of existing infrastructure is currently an unknown, but is likely to place a heavy cost both financially and in terms of time to complete. Any proposed development should be on the basis that all the infrastructure utilities, site roads and landscaping are complete before dwellings are complete. Occupiers of these houses should not be expected to live on a building site while infrastructure and further housing is completed, for what could be 5, 10,15 or even 20 years. That is an unacceptable period for continuous disruption and mess.

The practical implications of building such a large number of houses at this location do not appear to have been thought through. The location is not readily accessible, and the quantity of heavy traffic generated on haul roads will cause serious problems affecting areas remote from the location for many years. The location is surrounded by low lying marshy levels, all of which adds to the time, cost and potential damage.

Finally, the surrounding countryside is very important to residents of Nailsea and its local communities as it provides the local agricultural and grazing land, routes for wildlife, and access to the countryside via the many local footpaths. This would be severely compromised by the proposal in Policy 7.7 which is in direct conflict with Strategic Priority 4 in the JSP.

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 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.

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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.