

West of England Joint Spatial Plan (formerly known as Joint Strategic Planning Strategy) Pre-commencement document summary responses to consultation 5th January 2015 – 6th March 2015

Responses have been received from private individuals as well as organizations including:

- Government Pipelines and Storage Systems behalf of Fisher German LLP
- Pegasus Group
- Whitchurch Parish Council
- Turley Association
- Initiative in B&NES and Bath Chamber of Commerce
- NHS Property Services Ltd, St Martins Hospital
- Federation of Bath Residents' Associations (FoBRA) Planning Sub-Committee
- Bitton Parish Council
- Downend & Bromley Heath Parish Council
- EDF Energy Nuclear New Build
- Sustrans
- Oldbury on Severn Parish Council
- Bristol Airport
- Cleeve Parish Council
- Gloucestershire County Council (GCC)
- The Coal Authority
- GLHearn on behalf of IREERE (owners of the Galleries shopping centre in Bristol)
- Bristol Civic Society
- Backwell Parish Council
- Yate Town Council
- Avon Fire and Rescue Service
- Marine Management Organisation
- West of England Nature Partnership
- Whitchurch Village Action Group
- Woodland Trust
- Public Health Bristol
- Persimmon Homes Severn Valley
- Savills on behalf of Taylor Wimpey
- Persimmon Homes Wessex
- David Lock Associates
- Saltford Parish Council
- Tetlow King Planning representing the South West Housing Associations and Registered Providers (HARP) Planning Consortium
- Business West
- Ian Jewson Planning Ltd
- Highways Agency
- Pill & Easton in Gordano Parish Council
- Bristol Green Party
- Campaign to Protect Rural England (CPRE) Avonside
- GVA on behalf of South Western Ambulance Service NHS Foundation Trust
- Home Builders Federation (HBF)
- Nathaniel Lichfield and Partners on behalf of Thornbury Consortium
- Yatton and Claverham Parish Council
- Natural England
- Avon Wildlife Trust
- NHS Property Services
- Barton Wilmore on behalf of consortium of national house builders
- Nathaniel Lichfield & Partners on behalf of the joint owners of The Mall shopping centre and other land at Cribbs Causeway
- Colliers
- Wrington Parish Council
- Duchy of Cornwall
- Locking Parish Council
- Long Ashton Parish Council
- Public Health St Martins Hospital
- Barrow Gurney Parish
- Alder King
- English Heritage

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
001	<ul style="list-style-type: none"> Request for assurance that the plans include a co-ordinated transport plan for the area. 	<p>In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport, preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan.</p>
002	<ul style="list-style-type: none"> Request for inclusion of names of the signatories and their role at the end of the pre-commencement document 	<p>The signatories on page 8 of the Pre-commencement document were:</p> <ul style="list-style-type: none"> -Councillor Tim Ball, Cabinet Member for Homes and Planning, Bath and North East Somerset Council; -Councillor Mark Bradshaw, Assistant Mayor for Place, Bristol City Council; -Councillor Elfan Ap Rees, Executive Member for Strategic Planning, Highways, Economic Development and Housing, North Somerset Council; and -Councillor Brian Allinson, Chair of the Planning, Transport and Strategic Environment Committee, South Gloucestershire Council.
003	<ul style="list-style-type: none"> Yate has had more than its fair share of development over recent years and should be excluded from any further development plans until access roads to the area from all directions have been significantly improved. 	<p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultation.</p> <p>The preparation of the Joint Spatial Plan will include an assessment of the strategic transport infrastructure required to deliver new housing and employment land / floorspace.</p>
004	<ul style="list-style-type: none"> No mention of the four Councils' involvement in or commitments to relation to River Basin Management Plans, under the Water Framework Regulations. Request for advise on how the West of England consortium propose to address ensuring that the proposed developments either enhance environmental water quality or at worst do not cause it to deteriorate beyond current status. 	<p>A review of the 2009 Severn River Basin Management Plan is underway and being led by the Environment Agency. The four West of England authorities are engaged in the review.</p> <p>An assessment of strategic flood risk will form part of the</p>

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		<p>evidence base of the Joint Spatial Plan.</p> <p>Detailed policies on flood risk and water quality are included in the Local Plans of the four West of England authorities.</p> <p>The four West of England authorities published the 'Sustainable Drainage Developers Guide' in March 2015. This provides advice on how new development in the West of England can deliver sustainable drainage.</p>

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005	<ul style="list-style-type: none"> Request to be informed of what is going to be included in the document regarding any plans for Thornbury in respect of housing, schools, leisure areas, business plans, business trading parks, retail plans. 	<p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p> <p>The preparation of the Joint Spatial Plan will include an assessment of the strategic transport infrastructure required to deliver new housing and employment land / floorspace.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultation.</p>
006	<ul style="list-style-type: none"> Document makes no mention of housing for older people - ie extra care housing. The older population is growing fast, and such housing will inevitably be in great demand. Query if this is being considered elsewhere. 	<p>This will be addressed in the evidence base preparation, particularly through the Strategic Housing Market Assessment. Further detail to be developed in Local Plans of each unitary authority.</p>
007	<ul style="list-style-type: none"> Ref to para 3 - What land and/or buildings will likely to be compulsory purchased, in regard to the plan? Ref to para 8 – Why is Bath mentioned as a separate housing market, and then not included in the SHMA outputs as Bristol and its surrounding areas are? 	<p>The Planning and Compulsory Purchase Act 2004, referred to in para 3 of the pre-commencement document, sets out the Government requirements for the production of development plans. Reference to the Act should not be mistaken to imply that land and buildings will be subject to compulsory purchase.</p> <p>Available evidence shows that there are two housing market areas (HMAs) across the West of England – the wider Bristol HMA and the Bath HMA. The approach taken to the Bath HMA reflects the recommendations of the B&NES Core Strategy exam inspector. The Joint Spatial Plan covers the areas of all four West of England</p>

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		authorities and will include spatial options applicable to the whole plan area which will be subject to sustainability appraisal and public consultation.
008	<ul style="list-style-type: none"> Request to add joined up public transport to the list for a true joint plan – not just 4 poorly connected segments – starting just behind the Engine shed with a sensible bus/rail interchange. 	In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport, preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan.
009	<ul style="list-style-type: none"> Submitted link to article ‘Why British prosperity is hobbled by a rigged land market’ 	The Joint Spatial Plan will be a development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004, the accompanying local planning regulations and the National Planning Policy Framework.
010	<ul style="list-style-type: none"> Document is deficient in that it does not contain a clear commitment to keep the general public informed of intentions and progress of the WofE JSPS and how these will be managed and promulgated in a continuous open and regular process. Various previous planning strategies’ in the region have been highly deficient in this respect and have been criticised as a consequence. 	Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published.
011	<ul style="list-style-type: none"> Request to change title of strategy to ‘The West of England Joint Strategy Plan’ as this is clearer, less verbose and avoids ambiguity. 	It is proposed to streamline the name of the document to ‘Joint Spatial Plan’.
012	<ul style="list-style-type: none"> Request for BREEAM Communities to be considered as part of the new strategic plan for the West of England. BREEAM Communities scheme is a site-wide sustainability assessment, assessing the economic, environmental and social sustainability of the master plans for large scale developments. BREEAM Communities is suitable for developments which are likely to have significant impacts on existing communities, infrastructure or the provision of local services. 	The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.

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		<p>It is considered that BREEAM Communities may be more appropriately considered through the Local Plan process.</p>
013	<ul style="list-style-type: none"> Approach is logical. Presumably the full paperwork will benchmark the existing situation against future ambitions/impact. 	<p>The evidence base documents referred to in the Pre-commencement Document will identify issues relevant to the scope of the Joint Spatial Plan. The Issues and Options Document will seek comment on these issues and the possible spatial options for addressing them.</p>
014	<ul style="list-style-type: none"> Request to be contacted if any works are in the vicinity of the GPSS pipeline or alternatively go to www.linesearchbeforeudig.co.uk for an online enquiry service. 	<p>Utilities infrastructure providers and other stakeholders will be contacted during the preparation of the Joint Spatial Plan in order to establish strategic infrastructure requirements. Strategic infrastructure necessary to deliver the spatial strategy will be subject to a Sustainability Appraisal. All key interested parties will be able to make comments through the formal preparatory stages of the Joint Spatial Plan in accord with the published timetable.</p>
015	<ul style="list-style-type: none"> Large 'National Home Developer' estates cannot be the best solution and should be rejected, by adopting re-development to improve new home supplies - using existing properties in community settlements; so as to constantly preserve our green productive landscapes as of importance. Sustainability is key. 	<p>Continued approaches to maximising the re-use of previously developed land are expected to form part of the spatial options which will be subject to a Sustainability Appraisal and statutory consultations. All stakeholders and interested parties will be able to make comments, including on the spatial options approach to meeting future growth requirements, through the formal preparatory stages of the Joint Spatial Plan, in accord with the published timetable.</p> <p>The Joint Spatial Plan will set out a housing requirement for the plan area to be delivered through</p>

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		<p>the Local Plans of each authority. The housing requirement will be informed by the Strategic Housing Market Assessment, Sustainability Appraisal and all other relevant evidence and the policies in the National Planning Policy Framework.</p>
016	<ul style="list-style-type: none"> • Would like to nominate land off Charlton Road / Redlynch Lane Keynsham BS31 2SN, for consideration in any proposal for housing development. 	<p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultation.</p> <p>The preparation of the Joint Spatial Plan will include an assessment of the strategic transport infrastructure required to deliver new housing and employment land / floorspace.</p>
017	<ul style="list-style-type: none"> • Note that work to date indicates that there continue to be two housing market areas in the sub-region. This prejudices the outcome of the SHMA which should, as part of the review of housing requirements, necessitate a review of the housing market areas. • If the SHMA is prepared for the wider Bristol area only (ie. excluding the B&NES area) then the SHMA's will not be consistent in terms of the timeframe. B&NES SHMA covers period 2011-2031 whereas the wider Bristol SHMA will be covering the period 2016-2036. Consequently the opportunity to coordinate future housing reviews as set out in the NPPG has been lost. This fundamental issue between the SHMA's will need to be addressed in the JSPS, both in terms of determining overall housing provision and the distribution. • Irrespective of B&NES inclusion/exclusion in the SHMA, there is a possibility that the authority will need to accommodate housing requirements from adjoining authorities. 	<p>Available evidence shows that there are two housing market areas (HMAs) across the West of England – the wider Bristol HMA and the Bath HMA. The approach taken to the Bath HMA reflects the recommendations of the B&NES Core Strategy exam inspector. The Joint Spatial Plan covers the areas of all four West of England authorities and will include spatial options applicable to the whole plan area. Therefore, the Joint Spatial Plan will enable the identified housing needs to be addressed through joint working across the West of England and ensure that development is properly coordinated in line with the Duty to Co-operate. The Bath SHMA is due to be updated in 2019.</p>

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	<ul style="list-style-type: none"> • Scope of the JSPS will be to consider the outputs of the SHMA to determine the overall housing requirement, however, it will also need to take account of the B&NES SHMA, but both cover different timeframes, unless it is updated separately. • It is considered that an appraisal of the Green Belt across the authorities will be required; this should be undertaken on a consistent basis as part of the evidence base for the JSPS. • A sustainability appraisal of alternative strategic locations and key sites will be required as the JSPS will include strategic locations and key sites which are critical to the delivery of the housing strategy for each district. • The timetable is noted ie examination in the Autumn of 2016 with adoption in 2017- consequently, the preparation of the respective local plans will be delayed. 	<p>Green Belt assessment will form part of the evidence base for the Joint Spatial Plan.</p> <p>The Joint Spatial Plan will be informed by a Sustainability Appraisal.</p> <p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p> <p>It is considered that the preparation of the Joint Spatial Plan will add certainty and confidence to the plan-led system as opposed to delay Local Plan reviews. By working jointly on strategic plan-making, as opposed to relying on separate plan reviews, will avoid duplication on evidence gathering and be more cost effective. This approach will reduce the risk at Local Plan reviews as it will provide a robust strategic policy framework compliant with the Duty to Co-operate.</p>
018	<ul style="list-style-type: none"> • No extension to South East Bristol should be made in line with Bristol City Councils current Core Strategy and B&NES Core Strategy which was ratified in 2014 by Inspector Emerson. 	<p>The Joint Spatial Plan will set out a housing requirement for the plan area which will then be delivered through the Local Plans of each authority.</p>

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	<ul style="list-style-type: none"> No more housing allocation should be given to Whitchurch Village in B&NES other than the RA5 200 dwellings in the strategic allocation and the RA1 allocation of 48 dwellings. Should there be a proposal to increase this allocation in light of any subsequent review, expect that B&NES & Bristol will protect the Green Belt at all costs between Bristol & Whitchurch Village in line with Government Policy and the recorded desire of the local community. 	<p>The requirement will be informed by the Strategic Housing Market Assessment, sustainability appraisal and all other relevant evidence and the policies in the National Planning Policy Framework.</p> <p>Spatial options will be subject to sustainability appraisal, public consultation and involvement which will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities.</p> <p>Green Belt assessment will form part of the evidence base for the Joint Spatial Plan.</p>
019	<ul style="list-style-type: none"> More development required at Thornbury including shopping centres, improved leisure facilities, roads and hospital. 	<p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultation.</p> <p>The preparation of the Joint Spatial Plan will include an assessment of the strategic transport infrastructure required to deliver new housing and employment land / floorspace.</p>

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020	<ul style="list-style-type: none"> • Concern and ambiguity with the role of Banes in this exercise. • The western part of Banes falls within the Bristol HMA, along with all of North Somerset and South Gloucestershire. The Bath HMA is very much centred on Bath and its immediate environs. The ORS work to date shows that it doesn't cover the whole of Banes. • Need for the JSPS to have regard to meeting needs in all four of the WoE UA's within the Bristol HMA – as clearly unmet needs in Bristol are also likely to have to be met in part within that (western) part of Banes that falls within the same HMA. Some clarity is therefore required to Para. 6 • Important to confirm that the underlying evidence will be aligned and comparable to enable the scope of the JSPS (Para 13) to be based on a consistent evidenced assessment. • In terms of the outlined scope of the JSPS, would also be useful to highlight the importance of the Plan showing a strong alignment between and economic housing needs. This has been a point of challenge in a number of recent local plan examinations as highlighted through the interim findings of the Inspector on both the Birmingham and Cheshire East Local Plans. • The importance of Economic Development Needs Assessment should be elevated in enabling the other aspects of the scope to be realised. 	<p>Available evidence shows that there are two housing market areas (HMAs) across the West of England – the wider Bristol HMA and the Bath HMA. The approach taken to the Bath HMA reflects the recommendations of the B&NES Core Strategy exam inspector. The Joint Spatial Plan covers the areas of all four West of England authorities and will include spatial options applicable to the whole plan area. Therefore, the Joint Spatial Plan will enable the identified housing needs to be addressed through joint working across the West of England and ensure that development is properly coordinated in line with the Duty to Co-operate.</p> <p>Noted. Evidence base preparation will be proportionate and robust. Preparation of the Joint Strategic Plan will be informed by an economic development needs and land assessment.</p> <p>Green Belt assessment will form part of the evidence base.</p>

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	<ul style="list-style-type: none"> Green Belt appraisal to be undertaken at an earlier stage rather than waiting on the outputs of the OAN and Economic development needs assessment. 	
021	<ul style="list-style-type: none"> Essential infrastructure should be put in place in advance of development in order that new neighbourhoods can be properly connected to the key urban centres of Bath, Bristol and Keynsham, both physically and virtually. This will allow a free flow of talent between the two cities and a potentially ever important mid-way urban centre and continue the success of the economic vitality that already exists. Transport is the essential element. Emphasise the importance of community, and will look for the creation of neighbourhoods with amenities, facilities and soul, rather than simply producing heartless dormitories. The valuable global brand of Bath should be recognised and preserved. This means there is a need to ensure that distinctive green space is preserved between urban centres. 	<p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure, including transport infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p> <p>Historic and landscape character considerations will form part of the evidence base of the Joint Spatial Plan which will be subject to sustainability appraisal.</p> <p>The approach to design is outside the scope of the Joint Spatial Plan. Approaches to design will be set out in</p>

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	<ul style="list-style-type: none"> • There must be an insistence on high quality design and building standards on any housing developments between Bristol and Bath in order that the World Heritage Site status is preserved. 	<p>Local Plans. Existing Local Plans contain policies which aim to secure high quality design. Good design is a requirement of the National Planning Policy Framework.</p>
022	<ul style="list-style-type: none"> • There have been a number of changes to building regs incorporating some BREAM (http://www.bre.co.uk/page.jsp?id=829) and climate change factors. Some developers will build only within these standards as to have better insulation, power generation costs more and may reduce margins. Developers are also willing to challenge requests with their highly-resourced legal and commercial teams so it is unclear what planning teams and residents can ask for within the JSPS. 	<p>The Joint Spatial Plan will provide the strategic vision and framework for development. It will be consistent with the sustainability policies of the National Planning Policy Framework.</p>
023	<ul style="list-style-type: none"> • Role of the NHS Property Services Ltd is to act as the forward planner for NHS premises both in terms of their rationalisation to release land for development in the future -usually housing- and to identify new requirements arising. This latter is seen as particularly important where major new housing schemes are proposed. Any new plans should identify health requirements and ensure these are addressed in any CIL 123 lists or s106 requirements. 	<p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy. Scope of the document is intended to be strategic with further detail to be developed in Local Plans of each unitary authority.</p> <p>Health Impact Assessments will form part of the Sustainability Appraisal process. Local Plans will also address local health-related matters.</p>
024	<ul style="list-style-type: none"> • While clearly it will be for B&NES to lead on further development of housing, employment and related infrastructure, FoBRA's primary interest will be in the 	<p>Scope of the document is intended to be strategic and will identify broad locations for development with</p>

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	<p>implications for the City of Bath which must be taken into account.</p>	<p>necessary supporting strategic infrastructure, including transport infrastructure.</p>
025	<ul style="list-style-type: none"> • Concerned at the possible dominance of the Strategy by Bristol as the largest population and the area offering less by way of undeveloped land. • As rural area Councillors, if it is felt that the Green Belt between Bristol and Bath and the Cotswolds Area of Outstanding Natural Beauty were under threat both would be defended vigorously against any change of policy or intention to develop. 	<p>The Joint Spatial Plan will set out a housing requirement and its spatial distribution for the plan area which will then be delivered through the Local Plans of each authority. The requirement will be informed by the Strategic Housing Market Assessment, sustainability appraisal and all other relevant evidence and the policies in the National Planning Policy Framework.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultation. Green Belt assessment will form part of the evidence base.</p>
026	<ul style="list-style-type: none"> • Downend & Bromley Heath Parish Council will wait to formally comment once full details of the proposed Joint Planning Strategy are published. 	<p>Noted.</p>
027	<ul style="list-style-type: none"> • Could not get a copy of the map to be attached ref paragraph 13 – This is of interest with possible 8000 houses at Filton. Communications by road and rail are especially vital, linked with the Bristol strategic plan for the Central Area. • There is no specific mention of latest methods of building, landscaping and about policies like the loop line, type green energy use. 	<p>No map was provided with the Pre-commencement document. In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport, preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan.</p> <p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary</p>

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	<ul style="list-style-type: none"> • Not much information on green energy housing, factory built housing, etc. • Aim must be to build houses producing their own heat and power. 200,000 buildings producing power 16KW per unit would not only help the environment but may well cut down power stations. • Would be helpful if consultation plans could be displayed in the libraries (not everyone has access to internet). 	<p>authority.</p> <p>Consultation documents will be made available in public libraries.</p>
028	<ul style="list-style-type: none"> • Interests include nuclear, coal and gas fired electricity generation, renewables, and energy supply to end users. Currently have no comments on the proposed content, scope or programme at this stage. Wish to be kept informed of any future consultations in order to put forward any representations at the appropriate stage. 	<p>Utilities infrastructure providers and other stakeholders will be contacted during the preparation of the Joint Spatial Plan in order to establish strategic infrastructure requirements. Strategic infrastructure necessary to deliver the spatial strategy will be subject to a Sustainability Appraisal. All key interested parties will be able to make comments through the formal preparatory stages of the Joint Spatial Plan in accord with the published timetable.</p>
029	<ul style="list-style-type: none"> • If Councils were trying to minimise flood risk, in which case it should be those within the catchment, ie South Glos, B&NES, Wiltshire, etc. If for example Wiltshire decides to tarmac half their area with houses and industry, water will be deeper downstream. 	<p>An assessment of strategic flood risk will form part of the evidence base of the Joint Spatial Plan.</p>
030	<ul style="list-style-type: none"> • Opportunity to incorporate health impact assessments as part of the evidence base review through collaborative working with health professionals. Many of the wider determinants of health are directly linked to planning, transport and access issues so omitting this from the scope of the JSPS would be a failing on current and future generations of the study area. 	<p>Health Impact Assessments will form part of the Sustainability Appraisal process. Local Plans will also address local health-related matters.</p>
031	<ul style="list-style-type: none"> • Issue of Flood Risk is significant. Interpretation of the NPPF disqualifies many if not all the sites proposed because the existing flood defences are not taken into account. This issue has been the subject of much debate and 	<p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p>

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	<p>correspondence with the various agencies who have influence culminating in advice from the Environment Agency that a proportionate strategic flood risk at level 2 for the area concerned might help to identify sites which could be the subject of modest development.</p> <ul style="list-style-type: none"> • Of critical importance for the estuarine parishes that the evidence base includes a relevant Strategic Flood Risk Assessment Level 2 to identify land which is suitable for development from a flooding perspective. 	<p>The preparation of the Joint Spatial Plan will include a strategic flood risk assessment (SFRA). Where appropriate more detailed proposals including any required SFRA work will be undertaken through local plan reviews.</p>
032	<ul style="list-style-type: none"> • Bristol Airport should be recognised within the JSPS as a key element of the strategic infrastructure offer in the South West. The Airport's connections to Bristol and other key nodes should also be included. • Request that infrastructure other than that supporting housing growth is also considered as part of the strategy. 	<p>Infrastructure providers and other stakeholders will be contacted during the preparation of the Joint Spatial Plan in order to establish strategic infrastructure requirements. Strategic infrastructure necessary to deliver the spatial strategy will be subject to a Sustainability Appraisal.</p> <p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy. Further detail to be developed in Local Plans of each unitary authority.</p> <p>Green Belt assessment will form part of the evidence</p>

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	<ul style="list-style-type: none"> Imperative to appraise the existing Green Belt in the sub-region in order to bring forward well thought out housing and economic developments which are supported by the appropriate strategic infrastructure. 	base for the Joint Spatial Plan.
033	<ul style="list-style-type: none"> Would like to be kept informed and added to the consultation database regarding the above strategy. 	Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published.
034	<ul style="list-style-type: none"> As a neighbouring authority, Gloucestershire County Council (GCC) will be particularly interested in issues relating to transport and strategic infrastructure requirements. 	Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published.
035	<ul style="list-style-type: none"> The Coal Authority has no specific comments to make on the proposed scope and programme of preparation for the joint strategic planning strategy. However, the Coal Authority would not wish to see a duplication of minerals policies within this strategic document as these are adequately covered in the relevant planning policy documents for the three authorities. 	Minerals policies will be out of scope of this strategic document.
036	<ul style="list-style-type: none"> JSPS should include an early review of the retail needs of the sub-region, on the basis that this key matter which is central to the preparation of a sustainable plan for the sub-region. 	The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan

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	<ul style="list-style-type: none"> • Authorities should be working together now on a strategic retail plan for the sub-region rather than relying on separate plan reviews thus creating a more effective and robust sub-regional evidence base, and avoiding duplication on evidence gathering and thus reducing the risk, uncertainty and costs for the WofE authorities. Such a plan produced at this stage can guide decisions on sub-regionally significant developments such as that currently proposed at the Mall at Cribbs Causeway. 	<p>reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy. Further detail to be developed in Local Plans of each unitary authority.</p> <p>The Joint Spatial Plan will establish the preferred spatial distribution of housing and employment development in the West of England for the period 2026-2036. One consequence of this will be the need for a strategic review of the need for, and location of, additional retail provision across the West of England to support sustainable growth. This will be undertaken through a new retail study which will demonstrate the Duty to Cooperate and will provide a consistent framework against which future policies for retail development will be brought forward in Local Plans. It is intended that the Study will be instigated once the spatial distribution of new housing and employment growth has been established. It is intended that the outputs of the retail study will be timed so that they can be taken into account as part of the evidence base for the Local Plan reviews. Until Local Plan reviews are completed planning for retail provision will be considered against core strategy and national policy guidance in the NPPF having regard to the sequential and retail impact tests.</p>
037	<ul style="list-style-type: none"> • Would welcome the opportunity to be involved in the preparation of the 	Public consultation and engagement will be carried out

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	<p>planning strategy. Possibly acting as a focus for some aspects of the civic and community consultation? Well able to take a more detached and strategic viewpoint than is the case with more locally focussed groups. This might be comparable to the involvement of Business West representing business interests.</p> <ul style="list-style-type: none"> • Query if there is scope to explore joint working with other civic groups in the West of England – for example in Bath, Clevedon and Weston super Mare- in order to assist and strengthen the planning work? Would be willing to explore this opportunity if considered appropriate. 	<p>in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published. Would welcome opportunities to engage with joint Civic Society groups.</p>
038	<ul style="list-style-type: none"> • The principle of four Councils working together appears a good idea, but Backwell Parish Council feel that it would be very difficult to accomplish. How can you compare North Somerset, which has large areas of green belt, as well as very few employment opportunities and a lack of traffic infrastructure, with the city of Bristol. 	<p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p>
039	<ul style="list-style-type: none"> • Confirm that the scope includes the issues that would want included, provided it adopts a spatial strategy approach, so that it includes social infrastructure as well as physical infrastructure. • Consider that the pressures Yate faces from the housing development already allocated in the current plan, are such that in addition to needing the land surrounding Yate put into the Green Belt, Transport and other physical infrastructure resolved, there is a need for the plan to assess the community carrying capacity. 	<p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
		Green Belt assessment will form part of the evidence base.
040	<ul style="list-style-type: none"> • Involve the universities; for example, Bristol has a group expert in urban development and Bath a specialist 'sustainability' group. • Ensure that every empty property is bought back into use. UA's should have all the necessary powers. • Require school, office, shop, supermarket development to include residential development above; • Commission and build modular houses which should be heated by renewable energy; • Set up a mutual finance company with priority for Small and Medium Sized Enterprises; • Peak time buses serving Bristol from Portishead, Nailsea and Clevedon are under-utilized; • Use park and ride locations as bus hubs; • Bus services should be re-regulated; • Consider guided busway to connect Pill and Portishead; • Four West of England authorities should consider setting up a mutual energy company; 	<p>Universities in the West of England area will be contacted at relevant stages in the preparation of the Joint Spatial Plan.</p> <p>Continued approaches to maximising the re-use of previously developed land are expected to form part of the spatial options which will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>These matters are not considered to be within the scope of the Joint Spatial Plan. Where they relate to matters which can be considered under the remit of the town and country planning system these will be considered as part of each council's local plan reviews.</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
041	<ul style="list-style-type: none"> • Fire and rescue infrastructure constitutes strategic infrastructure which contributes to the delivery of sustainable development and should be identified in the strategic planning framework and its evidence base. Wish to be fully involved in the plan preparation process. 	<p>Infrastructure providers and other stakeholders will be contacted during the preparation of the Joint Spatial Plan in order to establish strategic infrastructure requirements. Strategic infrastructure necessary to deliver the spatial strategy will be subject to a Sustainability Appraisal.</p>
042	<ul style="list-style-type: none"> • No specific comments to make [respondent provided general information on their remit]. 	<p>Infrastructure providers and other stakeholders will be contacted during the preparation of the Joint Spatial Plan in order to establish strategic infrastructure requirements. Strategic infrastructure necessary to deliver the spatial strategy will be subject to a Sustainability Appraisal.</p>
043	<ul style="list-style-type: none"> • Note that the document alludes to the Duty to Co-operate (DtC) and the potential that joint working offers for reducing risk associated with a possible legal challenge. The section on the DtC does not explicitly mention the role of the West of England Nature Partnership (WENP). • Clear indication from NPPF (para 144) that planning authorities should plan positively for green infrastructure. This suggests JSPS might have regard to this matter at the strategic level. Plan preparation should also include an assessment of existing and future capacity of natural environment to support planned growth. 	<p>The Localism Act requires local planning authorities to have regard to Local Enterprise Partnerships (LEPs) and Local Nature Partnerships (LNPs). WENP are therefore recognised as a key partner who it is hoped will continue to play an active and positive stakeholder role during the preparation of the Joint Spatial Plan. Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority. The Joint Spatial Plan will be consistent with the policies of the National Planning Policy Framework.</p> <p>The evidence base for the Joint Spatial Plan will include consideration of biodiversity and landscape character as an integral part of testing spatial locations and spatial strategy.</p> <p>Green Belt assessment will form part of the evidence</p>

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	<ul style="list-style-type: none"> Plan should be focussed on avoidance of impacts (or better still, enhancement of the natural environment through intelligent deployment of green infrastructure as a means of delivering necessary services). WENP has been working on a State of the Environment report for the region which seeks to establish a baseline in respect of the natural environment in the region. The 2011 White Paper, The Natural Choice, set an objective <i>“to be the first generation to leave the natural environment in a better state than it inherited”</i>. This is an important objective and one believed would be supported by the 4 Unitary Authorities. Data being collected, and the information partners have available, will be important to reflect upon in setting out the spatial strategy, and in conducting sustainability appraisal. As a partnership organisation would welcome timely information (insofar as it is possible to provide it) so that WENP might meaningfully consult with own partners prior to making submissions, or providing information, as the need arises. 	<p>base.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultation.</p> <p>Would welcome input from respondent and its partners regarding baseline data.</p> <p>Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published.</p>
044	<ul style="list-style-type: none"> The area around south east Bristol has many topographical prominences which must be taken into consideration when deciding matters, for example, the steep topography associated with Dundry Hill, Maes Knoll and Hursley Hill and their environs. In view of the above, there should be no south east Bristol extension. Should there be any proposal for housing increase in this area we would expect both 	<p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p> <p>All potential spatial options will be considered and the</p>

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	<p>councils of Bristol city and Bath & North East Somerset to protect the green belt between Bristol city and Whitchurch village as stated in government policy NPPF and in line with community wishes to see the green belt retained, protected and valued.</p>	<p>whole process will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>The preparation of the Joint Spatial Plan will include consideration of landscape character as an integral part of testing spatial locations. Green Belt assessment will also form part of the evidence base for the Joint Strategic Plan.</p> <p>Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published.</p>
045	<ul style="list-style-type: none"> • Query if the various assessments in para 14 are in order of priority for your consideration in the preparation of the JSPS. • It is only with unacceptable loss of green spaces of all categories that more development can be fitted in, with knock effects of deteriorating mental and physical health for the populace whether realized or not. This leads to the conclusion that the 'Green Belt and Greenfield' category should be the leading consideration. Having settled the outline of these areas it then becomes possible to fit development into the area available without upsetting the Green Belt/Greenfield category. • In order to achieve this, the developed footprint per unit of dwelling needs to be reduced. This points to multi story apartment buildings becoming the norm. Envisage buildings up to around 10 floors plus underground car parking. The buildings would be set in a pleasant 'garden' setting and would cite Butler House, Summerhill Road, BS5 as a good example to start from. 	<p>Assessments not listed in order of priority.</p> <p>Green Belt assessment will form part of the evidence base.</p> <p>Continued approaches to maximising the re-use of previously developed land are expected to form part of the spatial options which will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>All stakeholders and interested parties will be able to make comments, including on the spatial options</p>

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	<ul style="list-style-type: none"> • Re-emphasise that the establishment of inviolable boundaries to open space, and would inclusion of parks as well as Green Belt and green fields, should be considered first. The area, (mostly brown field), available for development will not be known until then. 	<p>approach to meeting future growth requirements, through the formal preparatory stages of the Joint Spatial Plan, in accord with the published timetable.</p>
046	<ul style="list-style-type: none"> • Whilst noting that the evidence base will include “Capacity studies including assessment of biodiversity, landscape and historic character”, it is believed that these issues should not be relegate to the periphery of the document but should inform the core content of the Strategy. It is important that the Strategy fully adheres to the NPPF. Ref para 114 NPPF recommends more habitat creation. • Therefore look forward to seeing the issues of biodiversity protection, and habitat creation around new development, addressed in the Strategy. 	<p>The Joint Spatial Plan will be consistent with the policies of the National Planning Policy Framework. The scope of the JSP is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p>
047	<ul style="list-style-type: none"> • Essential that agriculture and food production is included as a key part of the JSPS to address issues of breaching of planetary ecosystem boundaries, resource depletion and unpredictable economic shocks. • Essential JSPS is informed by appropriately expert technical studies of agricultural assets and land, including an emphasis on 'best and most versatile' agricultural land. Essential also that the needs of a resilient local food system are a key part of the JSPS. 	<p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p> <p>In preparing proposals for the Joint Spatial Plan account will be taken of the economic and other benefits of the best and most versatile agricultural land and also the implications for food systems as part of the overall Sustainability Appraisal process.</p> <p>Any specific policies regarding agriculture and food systems will be matters for the Local Plans of each unitary</p>

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	<ul style="list-style-type: none"> • It is welcome that habitat and green belt will be considered, but would like to be reassured that the whole 'state of nature' as an interconnected system, is considered in the JSPS. For this reason, JSPS must include in its scope a duty to work with the West of England Local Nature Partnership, and to require appropriate expert and comprehensive assessments of the state of nature in the WoE as part of the technical information to underpin the JSPS. • Consider the existing stock of underused buildings and their potential (with or without modification) to accommodate a greater number of dwelling units. In effect, must make best use of all existing buildings, rather than only looking to build new housing. 	<p>authority. For example, policies in Local Plans may address the role of green infrastructure such as open countryside / open space, including its role in food production.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>The Localism Act requires local planning authorities to have regard to Local Nature Partnerships (LNPs). Work will continue with prescribed bodies to ensure the Duty to Cooperate is continued to be met.</p> <p>Continued approaches to maximising the re-use of previously developed land are expected to form part of the spatial options which will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p>

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	<ul style="list-style-type: none"> • Would like to see explicit reference to, and appropriate assessments and standards to be achieved, relating to the need for all homes to be served by safe and accessible walking and cycling routes and to have access to high quality green and blue infrastructure for recreation and leisure. The magnitude of the long term economic benefit that arises from planning for active travel and for time spent in nature means that this needs to be a strategic consideration at WofE level. 	
048	<ul style="list-style-type: none"> • Important that JSPS reflects and meets the vision and objectives of the LEP, set out in its Strategic Economic Plan, 2014. That needs to be clearly set out as one of the key objectives of the JSPS. • Important that economic development needs and housing development needs in the WofE are closely aligned. • The other key alignment issue is that between the JSPS and the future transport strategy. 	<p>The Joint Spatial Plan will respond to and reflect the current West of England vision as set out in the Strategic Economic Plan (2014).</p> <p>The Joint Spatial Plan will set out a coordinated approach to quantum and distribution of housing and employment across the four authorities. The Economic Development Needs Assessment and Strategic Housing Market Assessment will inform the preparation of the Joint Spatial Plan.</p> <p>In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport, preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan.</p> <p>It is considered that the preparation of the Joint Spatial Plan will add certainty and confidence to the plan-led system as opposed to delay Local Plan reviews. By working jointly on strategic plan-making, as opposed to relying on separate plan reviews, will avoid</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<ul style="list-style-type: none"> • It is also necessary to clear up the confusion caused by plans in Bristol, North Somerset and Bath and North East Somerset due for review, by in or around 2016, prior to the anticipated adoption of the JSPS and provide a clear timetable for the review of all four Plans. It is also important that there is not any substantial slippage in the review of these Plans and that opportunities for parallel preparation are utilised, but in any event all Plans should be capable of being reviewed and adopted by early 2018. • Needs to be clear how and where broad locations and/or specific sites will be used and the difference between them. Important to be clear about the status of the key strategic sites; they should be identified as specific allocations in the adopted JSPS. 	<p>duplication on evidence gathering and be more cost effective. This approach will reduce the risk at Local Plan reviews as it will provide a robust strategic policy framework compliant with the Duty to Co-operate. Each Council will undertake to ensure its Local Development Scheme (LDS) is up to date and shows the Programme for its respective local plan review.</p> <p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority. The purpose of the Joint Spatial Plan is to consider through joint working the outputs of the new Strategic Housing Market Assessment alongside other evidence and technical studies, to test spatial options and to adopt a new formal sustainable strategic spatial framework that will guide the review and roll-forward of the unitary authorities' local plans.</p> <p>The Joint Spatial Plan will set out the framework for Local Plan reviews. It will set out a coordinated approach to quantum and distribution of housing and employment across the four authorities.</p> <p>Green Belt assessment will form part of the evidence base.</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<ul style="list-style-type: none"> • A key strategic housing issue is how any unmet housing needs in Bristol and Bath, which may be identified but which cannot be met in those administrative areas, are addressed. The Pre-commencement Document is silent on this issue, but it is important it is addressed up front to provide clarity through the JSPS process on how it will be addressed. • Green Belt Appraisal needs to be undertaken as early as possible in the process as part of the background work and in parallel with the preparation of the SHMA to ensure that if it is necessary to release or safeguard Green Belt land then the evidence base is in place to enable that to happen. • Lack of clarity on the outputs expected from the SHMA. Ref para 8 says 'if the evidence continues to show that there are separate housing market areas centred on Bristol and Bath, then the new SHMA will provide outputs for the wider Bristol HMA only'. This ignores the fact that the western part of Bath and North East Somerset is within the Bristol HMA. There have been no outputs from the ORS work but if separate housing market assessments are carried out for the Bath and Bristol HMA's and the Bath HMA only covers the environs of Bath, how will the rest of the Bath and North East Somerset administrative area be dealt with? The relationship between the two SHMA's and the JSPS is then important, as the housing requirement and spatial distribution that the 	<p>Available evidence shows that there are two housing market areas across the West of England – the wider Bristol Housing Market Area and the Bath Housing Market Area. The approach taken to the Bath HMA reflects the recommendations of the B&NES Core Strategy exam inspector. The Joint Spatial Plan covers the areas of all four West of England authorities and will include spatial options applicable to the whole plan area which will be subject to sustainability appraisal and public consultation.</p>

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	<p>JSPS will propose will cover the entirety of the two housing market areas and will need to set out specific figures for each administrative district. In addition it is important that the JSPS is then not constrained by the SHMA in assessing the potential for the rest of Bath and North East Somerset to meet potential unmet needs in Bristol against other alternative locations.</p>	
049	<ul style="list-style-type: none"> • It is also hoped that the JSPS will reflect and put into a statutory planning document the aspirations and objectives of the Local Enterprise Partnership (LEP). • Welcome the establishment of the Strategic Housing Market Reference Group as a forum through which the joint authorities can obtain the views of the development industry. It is important that this collaborative approach is adopted in other areas of the JSPS production, in particular the development of the evidence base. • Taylor Wimpey have a considerable amount of background technical information and evidence on the land south west of Bristol which will be promoted for development through the JSPS and the associated Strategic Housing Land Availability Assessment. This background evidence would be helpful to the joint authorities in developing a thorough understanding of the site. Would welcome a formal engagement process with officers responsible for producing the JSPS and the supporting evidence base in order to ensure that all the relevant and helpful information is available at the outset of the JSPS production process. • The overall housing requirement for the JSPS must be forward looking and seek to establish the plans which will deliver the economic aspirations and objectives of the LEP. The housing requirement should not be tied to past 	<p>The Joint Spatial Plan will respond to and reflect the current West of England vision as set out in the Strategic Economic Plan (2014).</p> <p>Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published.</p> <p>Evidence base preparation will be proportionate and robust.</p> <p>The Joint Spatial Plan will set out a housing requirement for the plan area which will then be delivered through the Local Plans of each authority. The requirement will be informed by the Strategic Housing Market Assessment, all other relevant evidence and the policies in the National Planning</p>

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	<p>migration trends which have led to the considerable undersupply of housing and consequential un-affordability of housing particularly for young people.</p> <ul style="list-style-type: none"> • In order to fulfil its obligations to plan for the most sustainable form of development, the JSPS should be informed by a Green Belt and greenfield assessment which fairly and transparently evaluates the sustainability credentials of all development growth options and is blind to planning policy based constraints. • The JSPS has a long timeframe (up to 2036) and, because it will then lead to the production of separate replacement Local Plans at the local authority level, is unlikely to be reviewed on a regular basis. As such, it is absolutely essential that it is based upon a robust and credible evidence base which fairly assesses all opportunities for growth within the West of England area on the basis of their sustainability credentials and attributes. • To give increased certainty to the community, landowners / developers and infrastructure providers, it would be highly preferable for the JSPS to allocate land for development rather than promote a two-tier approach which first identifies strategic locations and then requires local planning authorities to define precise development boundaries through the individual Local Plans. 	<p>Policy Framework.</p> <p>Green Belt assessment will form part of the evidence base.</p> <p>Noted. Evidence base preparation will be proportionate and robust.</p> <p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p>
050	<ul style="list-style-type: none"> • Would like authorities to: <ul style="list-style-type: none"> • Agree to include food systems in the JSPS • Agree to undertake necessary research to form a solid evidence base about the nature, spread and economic and other benefits of the local food economy across the sub region. 	<p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. In preparing proposals for the Joint Spatial Plan account will be taken of the economic and other benefits of the</p>

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	<ul style="list-style-type: none"> • To work with the four local authorities according to the Duty to Cooperate to co-create a city-region food charter • To review and transform how we all work together to ensure that all stakeholders are empowered decision makers in matters that affect their lives. • To engage with us, as active members of all aspects of the local food movement across the sub-region, to seek our expertise and advice and to work together to deliver projects that are aligned with the local strategies of the four authorities. 	<p>best and most versatile agricultural land and also the implications for food systems.</p> <p>Any specific policies regarding agriculture and food systems will be matters for the Local Plans of each unitary authority. For example, policies in Local Plans may address the role of green infrastructure such as open countryside / open space, including its role in food production.</p> <p>The Joint Spatial Plan will be prepared in accordance with the local planning regulations which will include a Sustainability Appraisal. Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities.</p>
051	<ul style="list-style-type: none"> • Note that the majority of local authorities within the sub-region are due to review their local plans by 2016 (South Gloucestershire 2018). This raises some concern regarding the anticipated timescale for the production of the JSPS which is timetabled for adoption in 2017. Given that the JSPS will establish the overall quantum of housing and jobs for the sub-region it will be vital that local development schemes are reflective of the JSPS timetable to achieve a consistent approach. 	<p>Each Council will undertake to ensure its Local Development Scheme (LDS) is up to date and shows the Programme for its respective local plan review. Local Plan reviews will start in 2016 as set out in current individual Local Plans.</p> <p>The Joint Spatial Plan covers the period up until 2036. The Plan will provide the strategic spatial framework that will guide the review and roll-forward of the unitary authorities' Local Plans.</p> <p>Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<ul style="list-style-type: none"> Persimmon Homes (Wessex) would welcome the opportunity to engage with the WofE LEP office and the four unitary authorities during the plan preparation period and wish to be notified of future opportunities to comment on the emerging JSPS. 	<p>the engagement process will be published. Key stakeholders will be approached at during the preparation of the Joint Spatial Plan.</p>
052	<ul style="list-style-type: none"> Urgency will be required for major infrastructure applications. Major traffic congestion could be eased by creating a short link road between the M4 and the A4174 Relief Road to the east of Bristol. Due to accessibility issues, Winscombe and the surrounding area should be specified for housing and jobs appertaining to the elderly and retired. Plus housing and jobs for leisure and sports activities as much skill and infrastructure already exists in this locality. For this car parks are needed. Health is all important. Using existing housing in a more efficient manner should be a target. Much housing stock can be better utilised by re-housing the elderly to release a chain of pent up demand. 	<p>Noted. In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport. Preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultation.</p> <p>Health Impact Assessments will form part of the Sustainability Appraisal process. Local Plans will also address local health-related matters.</p> <p>Continued approaches to maximising the re-use of previously developed land are expected to form part of the spatial options which will be subject to a Sustainability Appraisal and statutory consultations.</p>
053	<ul style="list-style-type: none"> It is not clear what approach would be taken in respect of the Bath and North East Somerset (BANES) SHMA, in terms of an agreement to a parallel review, or otherwise. 	<p>Available evidence shows that there are two housing market areas across the West of England – the wider Bristol Housing Market Area and the Bath Housing</p>

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	<ul style="list-style-type: none"> • The potential implications of planning effectively for and distributing growth appropriately across a sub-region through a reliance two SHMA's that have been informed by different baseline assumptions such as migration flows; household formation rates; employment trends; market signals; and affordable housing needs, should be explored further. • To illustrate the point, the current SHMA for BANES was prepared in 2013, and therefore would have been informed by the 2011-based household interim projections that cover a limited period up to 2021 and the 2008-based household projections that do not take account of the 2011 Census nor recessionary trends. Critically therefore, the BANES SHMA will not be informed by the recently published 2012-based Household Projections: 2012-2037 that use the 2011 Census, and therefore cannot test any scenarios resulting from any such mid-point between 2008 and 2012. Therefore, it could not be argued that the proposed approach, in relation to the OAN for BANES HMA, incorporates the latest available evidence as a basis for plan-making in the WofE, as required by national policy, and referenced in para 14 of document. • It is critical that the development objectives of the JSPS in relation to the scale and distribution of growth are supported by necessary infrastructure. As such any assessment of strategic infrastructure requirements, such as a Joint Transport Strategy, should be aligned with the time horizon of the JPSP a period of 2016-2036. • This is also a relevant point in relation to the WofE Strategic Economic Plan 2014 that currently supports an economic strategy limited to 2030. 	<p>Market Area. The approach taken to the Bath HMA reflects the recommendations of the B&NES Core Strategy exam inspector. The Joint Spatial Plan covers the areas of all four West of England authorities and will include spatial options applicable to the whole plan area.</p> <p>In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport, preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan. The Joint Spatial will respond to and reflect the current West of England vision as set out in the Strategic Economic Plan (2014). The Economic Development Needs and Land Assessments will inform the preparation of the Joint Spatial Plan.</p>
054	<ul style="list-style-type: none"> • Given Saltford is bisected by the A4, concern about potential negative impact 	All potential spatial options will be considered and the

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<p>of development on local air and noise pollution, congestion and road safety.</p> <ul style="list-style-type: none"> • Saltford is surrounded and washed over by the Green Belt and is a prime example of the need for Green Belt land. This is particularly important in respect of the A4 corridor between Bath and Bristol and is essential to prevent urban sprawl and forcing together of towns and villages. We look to the JSPS to protect the valuable National asset that is the Green Belt. • Saltford, through organic growth, driven by its surroundings and natural resources, has become an important area for sport and recreation in the County and the region. Request that the value and importance of these amenities be added to the list of other matters to be considered in the strategy. • The Parish Council wish to be keep informed of the progress of the developing Strategy, to be consulted as an interested party and to be able to give evidence as part of this consultation at the appropriate time. 	<p>whole process will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultation. Green Belt assessment will form part of the evidence base.</p> <p>Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published.</p>
055	<ul style="list-style-type: none"> • Principal concern is to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region. • Expect the SHMA to: <ul style="list-style-type: none"> • Thoroughly and objectively assess the need for affordable rented and social rented housing. • Take into account the findings of Inspectors' recent conclusions on the Eastleigh Borough Plan and Stroud District Local Plan, both of which make it clear that private rented housing does not constitute a valid substitute for affordable housing and should not be allowed for in any affordable housing figure. 	<p>The Strategic Housing Market Assessment will be prepared in accordance with published guidance. Its purpose is to establish the objectively assessed need (both market and affordable housing) for the wider Bristol housing market area. This will provide the evidence to enable the Joint Spatial Plan and future Local Plans to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, including, for example, housing requirements of older people.</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<ul style="list-style-type: none"> • Include the objectively assessed need for the housing requirements of older people. • Fully account for market signals. • Ensure any housing figure is based on aspirational economic projections; demographic trends will stilt growth as any trends they show will be based over an economic recession. • Break down all data by local authority level. 	<p>It will be the role and purpose of the Joint Spatial Plan to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p>
056	<ul style="list-style-type: none"> • A robust and ambitious Strategic Housing Market Assessment is needed to ensure that legally robust housing numbers are in place, based on a realistic assessment of future jobs and household growth, in order to enable local authorities to plan and deliver the numbers needed. WofE would be best served by doing this via one Housing Market Area so as not to weaken the strategic coherence of our region. • Interlink and include alongside a regional strategic transport plan to ensure that planning for future growth and future transport infrastructure investment happen alongside each other, in order to maximise the efficiencies and opportunities of both. • Undertake a proper and comprehensive spatial review of land use. At present the WofE has a high level of constrained land supply, due to significant amounts 	<p>Available evidence shows that there are two housing market areas across the West of England – the wider Bristol Housing Market Area and the Bath Housing Market Area. The approach taken to the Bath HMA reflects the recommendations of the B&NES Core Strategy exam inspector. The Joint Spatial Plan covers the areas of all four West of England authorities and will include spatial options applicable to the whole plan area.</p> <p>In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport, preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan.</p> <p>Evidence base preparation will be proportionate and robust.</p> <p>The approach to Green Belt in the Joint Spatial Plan will be in accordance with the National Planning Policy Framework. Green Belt assessment will form part of the evidence base.</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<p>of land designated as either Green Belt or as Areas of Outstanding Natural Beauty or having existing landscape constraints. These constraints are higher in the WofE than in other areas of similar economic and demographic profile, for example Oxford, Cambridge and Milton Keynes. One of most significant factors is the presence of a high level of Green Belt land.</p> <ul style="list-style-type: none"> • Suggest that Business West hosts jointly with the WofE Local Economic Partnership, and in co-operation with the four WofE local authorities, a “plan making business reference group”. The aim of this group would be to review progress every three or six months and allow the business community the opportunity to offer constructive advice, research and experience in ensuring the future strategy is as effective and well informed as possible. 	<p>Would welcome opportunities to engage with this group.</p>
057	<ul style="list-style-type: none"> • It is not appropriate for the proposed Strategic Housing Market Assessment (SHMA) to exclude Bath & North East Somerset (BANES). • The key the purpose of the JSPS is to set the housing requirements for each of the four WofE authorities for the period 2016 to 2036. When the four authorities undertake the early reviews of their Core Strategies they will incorporate the JSPS housing requirements and adjust their spatial strategies accordingly. • Policy DW1 (District-Wide Spatial Strategy) of the BANES Core Strategy commits BANES to undertaking an early review of the Core Strategy and states <i>"The first review will be timed to co-ordinate with the review of the West of England Core Strategies in around 2016"</i>. The decision not to include BANES in the updated SHMA will mean that BANES will not be able to undertake a proper review of their Core Strategy as the JSPS will simply have to incorporate their current housing requirement on the basis that there will be no evidence available to assess whether it needs to be adjusted. 	<p>Available evidence shows that there are two housing market areas across the West of England – the wider Bristol Housing Market Area and the Bath Housing Market Area. The approach taken to the Bath HMA reflects the recommendations of the B&NES Core Strategy exam inspector. The Joint Spatial Plan covers the areas of all four West of England authorities and will include spatial options applicable to the whole plan area.</p> <p>The Joint Spatial Plan will set out a housing requirement for the plan area which will then be delivered through the Local Plans of each authority. The requirement will be informed by the wider Bristol HMA Strategic Housing Market Assessment and all other relevant evidence and the policies in the National Planning Policy Framework.</p> <p>The B&NES Core Strategy was recently adopted and</p>

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	<ul style="list-style-type: none"> • This will likely result in the JSPS being found unsound at examination for the following reasons: <ul style="list-style-type: none"> • The housing requirement in the current BANES Core Strategy is based upon a SHMA prepared in 2009 (an update paper was prepared in 2013). This document will be 7 years old by the time the JSPS is subject to examination and will therefore be out-of-date. The JSPS would therefore not be 'justified', one of the four tests of soundness set out in the NPPF. • The time period for the current BANES Core Strategy runs from 2011 to 2029. This means that the JSPS will have to apply a pro-rata increase to the BANES housing requirement in order to extend it to 2036. This is not a robust approach and will mean that the JSPS would not be 'justified', one of the four tests of soundness set out in the NPPF. • In order to be considered 'positively prepared', one of the four tests of soundness in the NPPF, a plan should "be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development". The JSPS will fail this test as there will be no up-to-date evidence available to assess whether BANES has any unmet housing requirement that needs to be accommodated in one of the neighbouring authorities. • Strongly urge the WofE Partnership to ensure that the scope of the SHMA includes BANES. As set out above failure to do this is likely to result in the JSPS being found unsound at examination. 	<p>sets out a housing requirement for Bath and North East Somerset to 2029. It is based on the Bath SHMA which covers the separate Bath housing market area. The approach taken to the Bath HMA reflects the recommendations of the B&NES Core Strategy exam inspector. The Joint Spatial Plan will seek to accommodate the housing needs of the wider Bristol HMA as identified in the Wider Bristol Strategic Housing Market Assessment.</p> <p>B&NES will continue to work closely with the West of England authorities to consider the most appropriate proposals for accommodating housing needs that could not otherwise be met within the Wider Bristol Housing Market Area.</p>
058	<ul style="list-style-type: none"> • Keen to engage on the development of this area of the strategy as well as via the individual authority local plans and would like to be advised on progress as 	<p>As a prescribed body under the Duty to Co-operate, Highways England will be a key partner in the</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<p>the strategy develops.</p>	<p>preparation of the Joint Spatial Plan in order to establish strategic transport infrastructure requirements.</p>
<p>059</p>	<ul style="list-style-type: none"> • Concern about shortage of affordable housing within Parish Council area. • Concern about proposed ‘top down’ nature of identifying new housing numbers. Likely to not fit local demand. Instead, will encourage out-commuting to the detriment of community integrity so that the parish becomes a Bristol suburb, contrary to Green Belt designation. Should be a mechanism to allow parish-level demand to inform Strategic Housing Market Area calculations. 	<p>The Strategic Housing Market Assessment will be prepared in accordance with published guidance. Its purpose is to establish the objectively assessed need (both market and affordable housing) for the wider Bristol housing market area. This will provide the evidence to enable the Joint Spatial Plan and future Local Plans to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. The Joint Spatial Plan will set out a housing requirement for the plan area which will then be delivered through the Local Plans of each authority.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultation.</p>
<p>060</p>	<ul style="list-style-type: none"> • JSPS must address the issue of competing land-use especially when it comes to food. • Specific three-fold guidance is offered: <ul style="list-style-type: none"> • That prime or agricultural land (grade 1 and 2) is set aside for food-production. • Where possible, plots for growing food are to be incorporated into planned developments. • Wildlife corridors and especially ‘bee-friendly’ planting should be incorporated as a standard practice. 	<p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform Local Plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p>

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	<ul style="list-style-type: none"> • Need to prioritise use of brown-field sites, bringing empty housing stock into use and converting suitable non-residential buildings into homes. • Would like to encourage alternative models of housing provision and ownership. 	<p>In preparing proposals for the Joint Spatial Plan through the sustainability appraisal and public engagement process, account will be taken of the economic and other benefits of the best and most versatile agricultural land and also the implications for food systems.</p> <p>Any specific policies regarding agriculture and food systems will be matters for the Local Plans of each unitary authority. For example, policies in Local Plans may address the role of green infrastructure such as open countryside / open space, including its role in food production.</p> <p>Continued approaches to maximising the re-use of previously developed land are expected to form part of the spatial options which will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>The Strategic Housing Market Assessment will provide evidence to enable the Joint Spatial Plan and future Local Plans to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, including, for example, people wishing to build their own homes.</p>

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061	<ul style="list-style-type: none"> • Evidence to support the preparation of this JSPS is essential. Suggest utilise CPRE-produced evidence: <ul style="list-style-type: none"> • Detailed tranquillity maps Satellite data to create maps which monitor the levels of light pollution in different areas. • Neighbourhood plans, where available, should also be a source of local evidence that can be used to contribute to the JSPS. • Expect the JSPS process to analyse evidence on the following: <ul style="list-style-type: none"> •Population and household forecasts •Housing market intelligence and need / affordability analysis •Housing land availability •Employment land availability •Retail need, capacity and hierarchy •Town centres, particularly any information on vitality or ‘health checks’ •Transport •Urban capacity – especially brownfield land availability •Landscape and countryside characterisation •Ecological information and designations •Built / archaeological heritage characterisation 	<p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p> <p>Evidence base preparation will be proportionate to the scope of the document. Paragraph 14 of the Pre-commencement Document sets out the proposed evidence base documents.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<ul style="list-style-type: none"> •Open space (also often referred to as green infrastructure) provision and deficiencies •Food webs mapping (see below for more information) <ul style="list-style-type: none"> • In relation to the forthcoming Strategic Market Housing Assessment believe that housing surveys that imply higher levels of new building should be given less weight if the figures in them have not been tested against relevant constraints, which include infrastructure as well as landscape considerations. <ul style="list-style-type: none"> • Advocate the JSPS consideration of the following areas of local evidence and policy: <ul style="list-style-type: none"> •Identification of local environmental limits •Local characterisation of landscape and built environment, for example through the evidence available from local neighbourhood plans •Policy designations for local landscape and built environment features •CPRE initiatives around tranquillity and light pollution • JSPS should advocate ‘smart growth’ for the WofE. ‘Smart growth’ describes policies aimed at creating walkable neighbourhoods, achieving brownfield urban regeneration, minimising the energy and transport demands of urban areas and reducing greenfield development pressures. • Important that the JSPS shows clear recognition of specific environmental elements of sustainable development, particularly the concept of living within environmental limits. • The JSPS offers an opportunity to plan development on a strategic basis, focusing on improving and recovering exiting centres rather than diluting them with out of centre development, or resorting to inter-centre competition. This joint authority co-operation is particularly important when considering the 	<p>Continued approaches to maximising the re-use of previously developed land are expected to form part of the spatial options which will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>The Joint Spatial Plan will establish the preferred spatial distribution of housing and employment development in the West of England for the period 2026-2036. One consequence of this will be the need for a strategic review of the need for, and location of, additional retail provision across the West of England to support sustainable growth. This will be undertaken through a new retail study which will demonstrate the Duty to Cooperate and will provide a consistent framework against which future policies for retail development will be brought forward in Local Plans. It is intended that the Study will be instigated once the spatial distribution of new housing and employment</p>

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	<p>potential expansion of out of centre shopping at Cribs Causeway, expansion of which could risk the success of city centre shopping and generate more unsustainable transport patterns.</p> <p>• This is an opportunity to make the most sustainable transport options the easiest ones for people to take. Need to plan our transport that puts new</p>	<p>growth has been established. It is intended that the outputs of the retail study will be timed so that they can be taken into account as part of the evidence base for the Local Plan reviews. Until Local Plan reviews are completed planning for retail provision will be considered against core strategy and national policy guidance in the NPPF having regard to the sequential and retail impact tests.</p> <p>In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport, preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan.</p> <p>In preparing proposals for the Joint Spatial Plan account will be taken of the economic and other benefits of the best and most versatile agricultural land and also the implications for food systems.</p> <p>Any specific policies regarding agriculture and food systems will be matters for the Local Plans of each unitary authority. For example, policies in Local Plans may address the role of green infrastructure such as open countryside / open space, including its role in food production.</p>

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	<p>housing, jobs, shops and services close to public transport or within easy walking or cycling distance. Concentrating new development on brownfield sites in our towns and cities not only contributes to their economic health and regeneration, but is likely to be the most sustainable outcome in terms of transport choice.</p> <ul style="list-style-type: none"> • Vital that the JSPS takes into consideration Food Systems. The WofE Duty to Cooperate Schedule references Food Systems: To protect and enhance the resilience of the food system. It seems entirely appropriate that this should be considered on a WofE basis taking into account the specific Local Food Strategies that have already been produced in Bristol and Bath. 	
062	<ul style="list-style-type: none"> • No specific comments to raise at this stage. • Request that it is consulted during the production of any relevant evidence base assessments to ensure that the potential impacts for the future delivery of the Trust’s services is considered and mitigated as a result of potential growth within the WofE. 	<p>Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published.</p>
063	<ul style="list-style-type: none"> • Essential that strategies for economic growth and housing are aligned. • The consultants commissioned to review the objectively assessed housing need (OAHN) have re-affirmed that there are two HMAs comprising of a self-contained BANES HMA and a Bristol HMA for Bristol City, North Somerset and South Gloucestershire. This re-affirmation creates a conundrum as the housing requirement figure and the spatial distribution proposed in the JSPS covers all four authorities. At this time it is difficult to know how the evidence bases for 	<p>Noted. The Joint Spatial Plan sets the framework for Local Plan reviews to ensure a coordinated approach to quantum and distribution of housing and employment across the four authorities.</p> <p>Available evidence shows that there are two housing market areas across the West of England – the wider Bristol Housing Market Area and the Bath Housing Market Area. The approach taken to the Bath HMA reflects the recommendations of the B&NES Core Strategy exam inspector. The Joint Spatial Plan covers the areas of all four West of England authorities and will include spatial options applicable to the whole plan</p>

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	<p>the two HMAs will be amalgamated as different base data and time periods have been used.</p> <p>• There is also uncertainty about whether or not the JSPS will allocate sites. It is understood that a Call for Sites (over 10 units) has been instigated but that the JSPS will propose only broad locations for growth and identify key sites.</p>	<p>area.</p> <p>The Joint Spatial Plan will seek to accommodate the housing needs of the wider Bristol HMA as identified in the Wider Bristol Strategic Housing Market Assessment. The B&NES Core Strategy was recently adopted and sets out a housing requirement for Bath and North East Somerset to 2029. It is based on the Bath SHMA which covers the separate Bath housing market area. B&NES will continue to work closely with the West of England authorities to consider the most appropriate proposals for accommodating housing needs that could not otherwise be met within the Bristol Housing Market Area.</p> <p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p>
064	<p>• The Consortium, a group of local landowners, controls a significant area of land</p>	<p>The Joint Spatial Plan will be a formal development plan</p>

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	<p>to the West and North of Thornbury (in South Gloucestershire Council's (SGC's) administrative area). This land, which is not within the Bristol and Bath Green Belt, is available for development and could make a significant contribution to meeting the area's development needs over the identified JSPS period (2016-2036), including the need for additional housing. The Consortium has made a simultaneous submission to SGC's Call for Sites.</p> <ul style="list-style-type: none"> • Essential that the scope and content of any JSPS provides sufficient detail to enable strategic sites and infrastructure to come forward without delay. • Would not support a JSPS which identifies broad locations but relies on future Local Plan documents to bring forward detailed policies or allocate specific boundaries before development can proceed. • The JSPS must be consistent with national planning policy in particular the need to boost significantly the supply of housing supply (NPPF para 47) and support economic growth (Para 19). 	<p>document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy. All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal.</p> <p>The Joint Spatial Plan will be consistent with the policies of the National Planning Policy Framework.</p>
065	<ul style="list-style-type: none"> • The process of developing a JSPS needs to take account of local views as expressed in Neighbourhood and Parish Plans. • What is the scrutiny process that ensures our representatives are effectively engaging in developing a joint strategy, within the local authority and at a sub-regional level? 	<p>The Joint Spatial Plan will be prepared in accordance with the local planning regulations. Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities.</p> <p>Governance for this project is in place, regular reports are made at the Planning Housing and Communities Board. The Joint Spatial Plan will be subject to approval by each of the four unitary authorities and will ultimately be tested through an Examination in Public</p>

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	<ul style="list-style-type: none"> • What scrutiny process is there on the decisions made by the JSPS and the Local Enterprise Partnership (LEP) and how do they inform each other? • North Somerset is a predominantly rural county. How can the historical and rural character be protected from a sub-regional strategy that is increasingly encouraging rural areas to become more urbanised and satisfy the housing needs of Bristol? • Land availability assessments –If the Assessments do not take into account local aspirations, needs and the significant constraints of some areas e.g. flooding, restricted highways, then the evidence based assessments are flawed and opens 	<p>(EiP) undertaken by an independent Inspector appointed by the Secretary of State.</p> <p>The Joint Spatial Plan will set out a housing requirement for the plan area which will then be delivered through the Local Plans of each authority. The requirement will be informed by the Strategic Housing Market Assessment, all other relevant evidence and the policies in the National Planning Policy Framework. All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>Noted. Evidence base preparation will be proportionate and robust. Evidence base preparation will be undertaken jointly the four UAs, with consultancy support as required.</p> <p>Work will continue with adjoining authorities and prescribed bodies (inc Natural England, Environment Agency and Local Nature Partnership) to ensure Duty to Cooperate is continued to be met.</p> <p>The evidence base will inform the preparation of the spatial options for new housing and employment development. The spatial options and evidence base documents will be subject to public consultation.</p>

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	<p>the door to developers with their over –optimistic and speculative housing figures.</p> <ul style="list-style-type: none"> • Habitats Regulation Assessment: The increasing urbanisation of rural communities is very relevant to environmental issues. The cumulative effect of building and the need for more developed infrastructure will impact on habitats; protected species and ultimately destroy the rural character of the county. How will the JSPS and LEP work with local people and environmental organisations to gather evidence and who will undertake the Habitats Regulation and Ecological assessments? • Infrastructure assessments and requirements need huge financial investments prior to agreeing housing developments. Rural infrastructures cannot cope with the impact of ever increasing housing developments and abandonment of communities by developers once the estates have been built. • Most of the economy in North Somerset is built on small and medium sized enterprises (SME) and need to be encouraging and supporting their growth. The building of houses in itself does not create sustainability as once built, the workforce leaves. A recent travel survey in Claverham 90% worked outside the village so perhaps we need to be looking at small industrial units that provide employment for young people and reflect the issues within rural communities. • The JSPS is assessing the needs of Bristol and there needs to be much more consideration to the various parts of North Somerset. North Somerset should be linking with other rural authorities, Somerset and Wiltshire. The South West rural authorities experience the highest communication deprivation in England. Poor rail, bus and road infrastructures, limited IT networks and yet we are expected to absorb all the housing needs and economic growth of our urban partners. 	<p>The Joint Spatial Plan will set out a housing requirement for the plan area which will then be delivered through the Local Plans of each authority. The requirement will be informed by the Strategic Housing Market Assessment, all other relevant evidence and the policies in the National Planning Policy Framework.</p> <p>The Joint Spatial Plan will set out the framework for Local Plan reviews. It will set out a coordinated approach to quantum and distribution of housing and employment across the four authorities. In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport, preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan.</p>

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	<ul style="list-style-type: none"> • Being subjected to a piecemeal process where there is no clarity of how strategic and local agencies collaborate or inform each other. Each of the assessments appears to be undertaken in isolation without understanding the interrelated impact of one alongside the other and the needs of our communities. 	
066	<ul style="list-style-type: none"> • Without consultation and examination, the strategy will inevitably carry less weight and, whilst still potentially effective in meeting the duty to cooperate, would be less effective in demonstrating compliance with the Framework and the objectives of sustainable development. • Strategy will need to be effective and therefore deliverable. The proactive engagement of both developers and landowners is key to this. Rather than relying solely on the consultation stages (which are restricted to two periods) suggest that the use of developer forums or workshops would be a helpful format from which developer views and supporting evidence could be gained. • Concerned that Green Belt review is only identified as a 'maybe'. The previous evidence base, in respect to the West of England sub-region, has identified that the release of Green Belt is inevitable if development is to be distributed to meets needs and encourage sustainable commuting patterns, in response to NPPF paragraph 84. In order to meet the timescales set out, this work should be prioritised. • The evidence base review in respect of the distribution strategy should include a review of local plan Inspector's comments where those have been made in the context of the NPPF and where they have identified potential for additional suitable and sustainable sites. Ref to the South Gloucestershire Local Plan Inspector who reported 15 November 2013 para IR62 (after the publication of 	<p>Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. There will also be an independent examination by an inspector appointed by the Secretary of State.</p> <p>The approach to Green Belt in the Joint Spatial Plan will be in accordance with the National Planning Policy Framework. Green Belt assessment will form part of the evidence base.</p> <p>The Joint Spatial Plan will be prepared and informed by a proportionate and robust evidence base.</p>

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	<p>the NPPF). Suggest that the Inspector’s suggestions are taken on board and that this forms a key part of the assessment of the evidence base.</p>	
067	<ul style="list-style-type: none"> • Would be pleased to support early discussions about evidence, the spatial implications of housing, employment and infrastructure needs and how that sits with the strategic needs and priorities for the natural environment. • There are a range of strategic plans and projects that could add considerable value to the preparation of the JSPS, including: <ul style="list-style-type: none"> - A Forgotten Landscape HLF Landscape Partnership project, - local Biodiversity Action Plans (BAPs), - AONB Management Plans, National Character Area Profiles (NCAs), - National Improvement Areas (NIAs), - the emerging State of the Environment Report being prepared by the West of England LNP and - the adopted and future green infrastructure strategies. • Look forward to working with the councils and the WofE Local Nature Partnership to identify gaps in evidence. 	<p>As a prescribed body under the Duty to Co-operate, Natural England will be a key partner in the preparation of the Joint Spatial Plan. Natural England will play a key role in supporting the preparation of the Joint Spatial Plan including Habitats Assessment and its Sustainability Appraisal.</p> <p>Evidence base preparation will be proportionate to the scope of the document. Paragraph 14 of the Pre-commencement Document sets out the proposed evidence base documents.</p> <p>The Localism Act requires local planning authorities to have regard to Local Nature Partnerships (LNPs). LNP are therefore recognised as a key partner who it is hoped will continue to play an active and positive stakeholder role during of preparation of the Joint Spatial Plan.</p> <p>The evidence base will consider biodiversity and landscape capacity.</p>

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	<ul style="list-style-type: none"> • JSPS presents a great opportunity to consider biodiversity at a landscape scale across local authority boundaries. • The value of ecosystems services and the contribution the natural environment can make to the local economy is increasingly recognised by government and others, underpinned by extensive research. • Look forward to engaging with the JSPS process to avoid significant harm to the Severn Estuary European site and the wildlife that it supports and the WoE's internationally important bat sites. • Well planned and managed green infrastructure can provide multiple benefits to people, business and wildlife and is an essential component of planning for new development. A number of GI strategies exist or are in preparation in the WoE and would very much hope the JSPS recognises and supports the implementation of these. • JSPS might present an opportunity to develop an overarching and strategic approach to climate change adaptation in the WoE. Expect that green infrastructure, including sustainable drainage schemes (SUDs) will have a particularly important role to play and would welcome the opportunity to assist the councils in this and their new role as SUDS authorities. • It is also important to recognise that development outside an AONB but within 	<p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p> <p>The four West of England authorities published the 'Sustainable Drainage Developers Guide' in March 2015. This provides advice on how new development in the West of England can deliver sustainable drainage. Each authority in the West of England is planning to embed the Guide within the existing planning regime, in slightly different ways to reflect local requirements.</p> <p>Landscape character will be considered in the preparation of the Joint Spatial Plan. The Joint Spatial Plan will contain monitoring and implementation indicators proportionate to its scope.</p> <p>This will be addressed in the evidence base preparation, particularly through the landscape, ecology and habitat regulations assessment work. The plan preparation will take account of sustainability issues in line with the requirements of National Planning Policy Framework (NPPF). Work will continue with adjoining authorities and prescribed bodies to ensure Duty to Cooperate is continued to be met.</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<p>its setting can impact on its special landscape character.</p> <ul style="list-style-type: none"> • In step with national policy, suitable indicators for monitoring the effects of the JSPS on biodiversity should be included in the policies, and ideally for other aspects of the natural environment. • Would expect the Sustainability Appraisal/SEAs and Habitat Regulation Assessments undertaken for the four unitary authority plans and joint transport and waste plans to provide an important source of information in terms of the assessments of the JSPS, but would welcome the opportunity to discuss scope and objectives, ideally ahead of the formal scoping stage. 	
068	<ul style="list-style-type: none"> • In order to ensure the recovery and sustainability of ecological networks, certain areas must be regarded as highly sensitive. Development should be directed away from these areas and site allocations made through a strategic and accountable process. Such sites include: <ul style="list-style-type: none"> • European Designated Sites - such as Ramsar Sites and Natura 2000 sites (Special Protection Areas and Special Areas of Conservation) protected through the Conservation of Habitats and Species (Amendment) Regulations 2012. • National Designated Sites - Sites of Special Scientific Interest, National Nature Reserves and Local Nature Reserves. • Local Sites - non-statutory sites known as Sites of Nature Conservation Interest (or Local Wildlife Sites). • Avon Wildlife Trust also has 37 nature reserves throughout the region, most of which share the above designations. • No less important in terms of sustainability of wildlife at the local level are other wildlife groups' reserves. • These sites, including the non-statutory sites, must be given particular recognition under the JSPS. • It should also be recognised that some sites will meet the criteria for designated sites, without a formal designation. 	<p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p> <p>The evidence base will address biodiversity capacity and Habitats Regulations Assessment will be undertaken as appropriate.</p> <p>The Localism Act requires local planning authorities to have regard to Local Enterprise Partnerships (LEPs) and Local Nature Partnerships (LNPs). WENP are therefore recognised as a key partner who it is hoped will</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<ul style="list-style-type: none"> • Designated sites are protected in isolation rather than as a network, and connectivity between important sites and habitats is often overlooked. It has long been recognised that sites in isolation from one another are extremely vulnerable to degradation. • The WENP, of which AWT is a key partner, is leading on the development of initiatives to seek opportunities for landscape-scale protection and restoration of biodiversity in the West of England area. WENP has identified a Nature Improvement Area in the region; land adjacent to the Severn Estuary in the Severnside area. The WENP will also shortly be producing a State of the Environment Assessment, using ecosystem service mapping, which should be used by the WofE four UAs to take full account of ecological networks. • Avon Wildlife Trust has produced a strategy to underpin its commitment to this work, emphasising ecological connectivity at the landscape scale. This has identified five priority areas: <ul style="list-style-type: none"> •Cotswolds •Gordano Valley and Ridges •North Somerset Levels and Moors •Chew Valley •Avon Gorge and Downs • AWT has also established two major connectivity projects: <ul style="list-style-type: none"> •B Lines - a network of 3km-wide corridors across the region which are a priority for species-rich grassland and other habitat restoration; and •My Wild City - wildlife enhancement opportunities in private gardens and parks will be encouraged and supported to enhance connectivity for wildlife across Bristol. • It is vital that these areas and initiatives are recognised when planning future development priorities. 	<p>continue to play an active and positive stakeholder role during the preparation of the Joint Spatial Plan. Would welcome submission of this information for consideration.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>These matters will be considered and given planning policy framework expression as part of the preparation of the Joint Spatial Plan and in each council’s Local Plan reviews where appropriate and relevant. Green Belt assessment will form part of the evidence base for the Joint Spatial Plan.</p> <p>The evidence base will consider biodiversity and landscape capacity. This will inform the preparation of spatial options which will be subject to public consultation. Habitats Regulations Assessment will be</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<ul style="list-style-type: none"> • Bristol, Bath and Weston-super-Mare are also exceptionally biodiverse with notable populations of horseshoe bats, otter, badger and estuarine bird assemblages, even close to or within city centres. Policy will need to take account of opportunities for important urban wildlife as protecting rural areas such as Green Belt. • Comprehensive consideration of multi-functional green infrastructure within the strategic process will be key. • Any move towards biodiversity offsetting would need to be scientifically sound, with full appreciation of the importance of retaining and protecting certain habitats and difficulties in recreation/restoration of some habitat types. The mitigation hierarchy, as detailed in NPPF para 152 should always be followed. • A consideration of avoidance of impacts is key at an early stage and as an evidence-based approach is required to meet sustainable objectives, AWT would consider that the following factors will need to be included within the JSPS: <ul style="list-style-type: none"> • The impact of the overall housing requirement, and associated infrastructure requirements, in the context of environmental limits; • The impact of the distribution of housing, and associated infrastructure requirements, on designated sites and protected and notable species, including an assessment of the likely current ecological value of key sites and strategic locations; • Evidence of avoidance measures, including consideration of alternative sites; • Outline proposals for how the ecological value of key sites will be retained or impacts avoided, mitigation or compensated for, including strategic options such as biodiversity offsetting if appropriate; 	<p>undertaken as appropriate.</p> <p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>The preparation of the Joint Spatial Plan will include an assessment of the strategic transport infrastructure required to deliver new housing and employment land / floorspace.</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<ul style="list-style-type: none"> • Consideration of proposals in the context of maintaining and enhancing ecological networks, with links to key initiatives in the WofE area; • Consideration of ecosystem service provision in the strategic planning process; • Details of opportunities for enhanced provision of ecosystem services; • Evidence to demonstrate that true sustainable development will be prioritised, with environmental considerations given due importance and 'win-win' opportunities identified. 	
069	<ul style="list-style-type: none"> • Healthcare facilities are essential strategic infrastructure. JSPS should, therefore, consider the quantum and location of new healthcare facilities that would be required to ensure that the planned level of growth in housing is sustainable. • The WofE authorities should work with NHS commissioners to plan for healthcare facilities. 	<p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p> <p>Health Impact Assessments will form part of the Sustainability Appraisal process. Local Plans will also address local health-related matters.</p> <p>The appropriate bodies, including the NHS, will be contacted during the preparation of the Joint Spatial Plan to identify strategic infrastructure requirements.</p>
070	<ul style="list-style-type: none"> • It is considered that there are a number of potential pitfalls of the plan-making process that need to be avoided. <p>1. Undertaking a robust assessment of the Objectively Assessed Needs</p>	<p>The Strategic Housing Market Assessment will be prepared in accordance with published guidance and be proportionate to the scope of the Joint Spatial Plan. Its purpose is to establish the objectively assessed need</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<p>(OAN)including:</p> <ul style="list-style-type: none"> • <u>Ensuring a range of projections when deciding Forecasts for Jobs Population and Housing Need</u> Reference to High Court Judgement – Gallaghers vs. Solihull [2014] EWHC 1283 (Admin) on how to determine housing land supply • <u>Using the most appropriate Housing Market Area</u> • <u>Need for a robust and transparent Sustainability Appraisal to test option of meeting the full identified need.</u> <p>2. Undertake a Comprehensive Green Belt Review</p> <ul style="list-style-type: none"> • A comprehensive Green Belt review is overdue in the WofE. <ul style="list-style-type: none"> • JSPS will need to make sure that there are sufficient sites available in order to be able to demonstrate a five year housing land supply, a requirement of the NPPF (paragraph 47) and is necessary in order to be found sound. • Important that timetable for preparing JSPS is achieved to meet expectations of 	<p>(both market and affordable housing) for the wider Bristol housing market area. This will provide the evidence to enable the Joint Spatial Plan and future Local Plans to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. It will be the role and purpose of the Joint Spatial Plan to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p> <p>The approach to Green Belt in the Joint Spatial Plan will be in accordance with the National Planning Policy Framework. Green Belt assessment will form part of the evidence base.</p> <p>The plan preparation will take account of sustainability issues in line with the requirements of National Planning Policy Framework (NPPF).</p> <p>It is considered that the preparation of the Joint Spatial Plan will add certainty and confidence to the plan-led system as opposed to delay Local Plan reviews. By working jointly on strategic plan-making, as opposed to relying on separate plan reviews, will avoid duplication on evidence gathering and be more cost effective. This approach will reduce the risk at Local Plan reviews as it will provide a robust strategic policy framework compliant with the Duty to Co-operate.</p>

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	<p>Inspectors who examined the four unitary authorities Core Strategies regarding reviews of Local Plans.</p> <ul style="list-style-type: none"> As soon as the WofE SHMA is published, this will provide new evidence on housing needs in the WofE, which will supersede those requirements within the adopted Core Strategies, having the effect of rendering the existing plans out - of-date. 	<p>Each Council will undertake to ensure its Local Development Scheme (LDS) is up to date and shows the Programme for its respective local plan review.</p> <p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p> <p>In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport, preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan.</p> <p>Available evidence shows that there are two housing market areas across the West of England – the wider Bristol Housing Market Area and the Bath Housing Market Area. The approach taken to the Bath HMA reflects the recommendations of the B&NES Core Strategy exam inspector. The Joint Spatial Plan covers the areas of all four West of England authorities and will include spatial options applicable to the whole plan area.</p> <p>The development industry has been asked to provide</p>

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	<ul style="list-style-type: none"> • There needs to be a strong link between the transport plan and the JSPS. • Fundamentally oppose to the artificial segregation of B&NES into two different HMAs, which has the potential to undermine the entire JSPS. This point has been made through the SHMA Reference Group, but disappointed with the local planning authorities' response to date. • Consider that the most appropriate area for which to undertake the WofE Housing Market Assessment is to align with the four Authority's boundaries and replicated the Local Enterprise Partnership area. • Barton Wilmore has undertaken an assessment of objectively assessed needs (OAN) in the WofE, based on all four authorities, which provides the most up-to-date evidence available at present to determine the level of need throughout the WofE HMA. 	<p>market intelligence, including forecasts to be addressed in the evidence base preparation, particularly through the Strategic Housing Market Assessment. Evidence base preparation will be proportionate and robust.</p> <p>The Joint Spatial Plan will set out a housing requirement for the plan area to be delivered through the Local Plans of each authority. The housing requirement will be informed by the Strategic Housing Market Assessment, Sustainability Appraisal and all other relevant evidence and the policies in the National Planning Policy Framework.</p> <p>Scope of the document is intended to be strategic and will identify broad locations for development with necessary supporting strategic infrastructure. Further detail to be developed in Local Plans of each unitary authority.</p> <p>The Joint Spatial Plan will be prepared in accordance with the local planning regulations. Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published.</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<ul style="list-style-type: none"> • Query whether there is an intention to identify settlement housing targets, or areas of growth. Consider this to be a fundamental component to the JSPS. • Suggest that a reference group similar to that used for the SHMA is established to discuss the scope and evidence base of the JSPS to provide an open and transparent process for the preparation of the. 	
071	<ul style="list-style-type: none"> • The WofE Duty to Co-operate Schedule (updated September 2014) identifies 'Retail Development Centres' as a strategic cross boundary matter affecting all of the WofE authorities, as well as neighbouring authorities, and considers it is a duty to cooperate issue. Retail has been identified as strategic cross boundary matter and as such it follows that it should be dealt with in the JSPS. 	<p>The Joint Spatial Plan will establish the preferred spatial distribution of housing and employment development in the West of England for the period 2026-2036. One consequence of this will be the need for a strategic review of the need for, and location of, additional retail provision across the West of England</p>

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		<p>to support sustainable growth. This will be undertaken through a new retail study which will demonstrate the Duty to Cooperate and will provide a consistent framework against which future policies for retail development will be brought forward in local plans. It is intended that the Study will be instigated once the spatial distribution of new housing and employment growth has been established. It is intended that the outputs of the retail study will be timed so that they can be taken into account as part of the evidence base for the local plan reviews. Until local plan reviews are completed planning for retail provision will be considered against core strategy and national policy guidance in the NPPF having regard to the sequential and retail impact tests.</p>
072	<ul style="list-style-type: none"> • Submission relates to the promotion of land for residential development at Woodgrove Road, Henbury, Bristol. • It is not recommended that leaving other issues, detailed policy development and allocations of sub-regional strategic nature should be left to the individual unitary authorities. The JSPS should be the correct document to allocate strategic sites. • JSPS should undertake a full Urban Capacity review of available non-designated land within the City of Bristol. 	<p>Noted.</p> <p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p> <p>Preparation of the Joint Spatial Plan will include consideration of reasonable alternatives.</p>

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	<ul style="list-style-type: none"> • For the Plan to be considered justified the strategy must be appropriate when considered against the reasonable alternatives. The Pre-commencement Document sets out only one approach for the JSPS. • The Broad Location of Henbury should be considered a sustainable location for strategic residential development and this site will be appropriate for inclusion within the Plan. 	<p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations. Public consultation and engagement on spatial options will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities.</p>
073	<ul style="list-style-type: none"> • Submission in relation to promotion of land off Itchington Road, Tytherington near Thornbury for residential development. • JSPS should undertake a full review of the Bristol and Bath Green Belt. • Land to the south of Tytherington should be carefully considered as an appropriate location for further development. For example the land to the south of Tytherington has access to a vibrant village centre; is located within close proximity to the A38 and allows excellent access to the Strategic Road Network. 	<p>Noted.</p> <p>The approach to Green Belt in the Joint Spatial Plan will be in accordance with the National Planning Policy Framework. Green Belt assessment will form part of the evidence base.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations. Public consultation and engagement on spatial options will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities.</p>
074	<ul style="list-style-type: none"> • Submission in relation to the promotion of land to the west of Keynsham, Bath & North East Somerset for residential development. • JSPS should undertake a full review of the Bristol and Bath Green Belt and support the growth of sustainable settlements such as Keynsham. 	<p>Noted.</p> <p>The approach to Green Belt in the Joint Spatial Plan will be in accordance with the National Planning Policy Framework. Green Belt assessment will form part of</p>

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	<ul style="list-style-type: none"> • The Western Fringe of Keynsham should be carefully considered as an appropriate location for further development. For example the land to the west of Keynsham has access to a vibrant and diverse commercial centre; is located within close proximity to the ring road and allows excellent access to the Strategic Road Network. 	<p>the evidence base.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations. Public consultation and engagement on spatial options will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities.</p>
075	<ul style="list-style-type: none"> • Submission in relation to the promotion of land at Marsh Farm, Pucklechurch, South Gloucestershire for residential development. • The JSPS should be the correct document to allocate strategic sites. • JSPS should undertake a full review of the Bristol and Bath Green Belt and support the growth of sustainable settlements such as Pucklechurch. 	<p>Noted.</p> <p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p> <p>The approach to Green Belt in the Joint Spatial Plan will be in accordance with the National Planning Policy Framework. Green Belt assessment will form part of the evidence base.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<ul style="list-style-type: none"> The Eastern Fringe of Bristol should be carefully considered as an appropriate location for further development. For example Pucklechurch has a vibrant and diverse commercial centre, is located within close proximity to the ring road and allows excellent access to the Strategic Road Network. 	<p>Appraisal and statutory consultations. Public consultation and engagement on spatial options will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities.</p>
076	<ul style="list-style-type: none"> Particularly concerned about the potential impacts of any significant new housing development in the Green Belt and in the surrounding countryside. In Wrington’s case it is argued that the rural countryside to the south is even more sensitive to development than the Green Belt land to the north. This is because the land to the south links the Green Belt to the Mendip Hills AONB across Wrington Vale. Therefore, suggest that there should be no presumption that the Green Belt should be prioritised, but that all countryside in the sub-region should be equally protected, or at least considered equally. Express concerns about the traffic and transport issues raised by new development and the need to provide related infrastructure if the NPPF’s ‘sustainable development’ objectives are to be met. Rather than comment further and in detail, note that the Council is a member of the CPRE and fully supports the response submitted by CPRE Avonside. Request for this support to be recognised in the records and on the WofE website. 	<p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport, preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan.</p> <p>Noted.</p>
077	<ul style="list-style-type: none"> Just as the SHMA has been jointly commissioned it will be vital that assessments 	<p>Evidence base preparation will be proportionate,</p>

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	<p>listed in paragraph 14 are also jointly commissioned. This ought to ensure that the contributing factors are objectively assessed across the JSPS area.</p> <ul style="list-style-type: none"> Note that community and stakeholder engagement will take place in accordance with the Statement of Community Involvement for the four authorities and that formal consultation stages will take place over a minimum of six weeks. The Duchy would welcome the opportunity for any informal consultation and to assist in providing technical information and local knowledge for the preparation of assessments including those listed in paragraph 14. 	<p>robust and jointly prepared.</p> <p>Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published.</p>
078	<ul style="list-style-type: none"> Brown field sites as defined in the DGLC document, must be prioritised over green field sites. 	<p>Continued approaches to maximising the re-use of previously developed land are expected to form part of the spatial options which will be subject to public consultation.</p>
079	<ul style="list-style-type: none"> It seems that the JSPS is the 'Regional Spatial Strategy' by another name with a top down dictate of housing numbers. 	<p>It is proposed to streamline the name of the document to 'Joint Spatial Plan'. The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>The approach to Green Belt in the Joint Spatial Plan will</p>

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	<ul style="list-style-type: none"> • Concerned that this could be unreasonably onerous on North Somerset in particular, prompting a raid on our green belt land and resulting in unwanted, unsustainable and ill-conceived development in order to make up a shortfall in Bristol. • North Somerset has a predominance of green belt and floodplain. Much of what remains is high grade farmland, which places severe constraints on sustainable development, which need to be considered in the formulation of the planning policies. 	<p>be in accordance with the National Planning Policy Framework. Green Belt assessment will form part of the evidence base.</p>
080	<ul style="list-style-type: none"> • Some areas which would like to be given weight as the programme develops: <ul style="list-style-type: none"> • 1. Within the strategic housing assessment the matter of affordability must be given sufficient consideration. • 2. Land in the south west includes many diverse ecosystems, whether wilder or more managed, including agricultural land, all of which adds to the quality of life in the area. 	<p>The Strategic Housing Market Assessment will be prepared in accordance with published guidance and be proportionate to the scope of the Joint Spatial Plan. Its purpose is to establish the objectively assessed need (both market and affordable housing) for the wider Bristol housing market area. This will provide the evidence to enable the Joint Spatial Plan and future Local Plans to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, including, for example, affordable housing requirements.</p> <p>The evidence base will consider biodiversity and landscape capacity.</p> <p>In preparing proposals for the Joint Spatial Plan account will be taken of the economic and other benefits of the best and most versatile agricultural land and also the implications for food systems.</p> <p>Any specific policies regarding agriculture and food</p>

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	<ul style="list-style-type: none"> <li data-bbox="344 248 1301 316">• 3. Agricultural land is obviously relevant to our local food security as well as a contributor to the local economy. <li data-bbox="344 778 1301 879">• 4. It is important that walking and cycling is seen as equals alongside road and rail transport as being critical to the health of individuals and the cohesion of communities. <li data-bbox="344 1082 1234 1145">• 5. Housing needs are changing and many different sorts of units are needed beyond traditional family houses. <li data-bbox="344 1193 1301 1294">• 6. There are some successful examples both in the UK and in other countries of housing that has been conceived and build by self-organising groups of families or individuals which should be taken into account. 	<p data-bbox="1352 248 2018 427">systems will be matters for the Local Plans of each unitary authority. For example, policies in Local Plans may address the role of green infrastructure such as open countryside / open space, including its role in food production.</p> <p data-bbox="1352 475 2033 651">In order to ensure that the emerging spatial strategy is supported with the necessary infrastructure, particularly transport, preparation of the Joint Spatial Plan will be aligned with a review of its impact on the Joint Local Transport Plan.</p> <p data-bbox="1352 699 2033 954">The Strategic Housing Market Assessment will provide evidence to enable the Joint Spatial Plan and future Local Plans to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, including, for example, people wishing to build their own homes.</p>
081	<ul style="list-style-type: none"> <li data-bbox="344 1310 1301 1375">• Barrow Gurney Parish went through this process in the last ten years, with proposals for major development in the Green Belt houses to the South West 	<p data-bbox="1352 1310 1962 1375">The Joint Spatial Plan will set out a housing requirement for the plan area which will then be</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<p>of Bristol. This met with considerable opposition from Long Ashton, Barrow Gurney and Dundry.</p> <ul style="list-style-type: none"> • Whilst understanding the pressures, this Parish strongly supported North Somerset Council in their development proposals in 2013 which met with widespread approval and support by a large number of parishes. Nonetheless, Barrow Gurney is still facing a 30% increase in the number of houses in the Parish, based on existing approvals for the Barrow Hospital site. 	<p>delivered through the Local Plans of each authority. The requirement will be informed by the Strategic Housing Market Assessment, all other relevant evidence and the policies in the National Planning Policy Framework.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>The approach to Green Belt in the Joint Spatial Plan will be in accordance with the National Planning Policy Framework. Green Belt assessment will form part of the evidence base.</p>
082	<ul style="list-style-type: none"> • A comprehensive review of Green Belt boundaries across the entirety of the West of England is required. • It would be regrettable if the JSPS establishes a clear context for strategic releases that are then held back by the need for Local Plan reviews to establish detailed Green Belt boundaries and site specific policies. Whilst it might be outside the remit of the JSPS process, a subsequent process of Supplementary Planning Documents for the strategic sites would represent a more appropriate means of progressing sites in a timely manner. 	<p>The approach to Green Belt in the Joint Spatial Plan will be in accordance with the National Planning Policy Framework. Green Belt assessment will form part of the evidence base.</p> <p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy</p> <p>Would welcome submission of this information for</p>

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	<ul style="list-style-type: none"> • A significant body of work already exists that can feed into the JSPS/SPD process and subsequent planning applications. Would be pleased to present the information that exists for Hicks Gate. • It is acknowledged that there could (and most probably is) a separate HMA for Bristol and Bath, and if so, it is understood that the West of England SHMA will be a Bristol focused study. It is not clear why the implications for BANES would not be considered in this context. • Through the preparation of the BANES Core Strategy, it was established that there is a robust case for two separate HMAs for Bristol and Bath. It was deemed appropriate that a district-wide 'BANES HMA' could be considered reasonable for the purposes of that Core Strategy. This was in a context where the Duty to Cooperate was not engaged. In the context of the West of England JSPS this cannot possibly be regarded as appropriate and the needs of the Bristol HMA inclusive of the element that falls within BANES needs to be properly considered through this process. • Whilst it is acknowledged that BANES will be a full participant in the process, any consideration of the appropriate spatial distribution for Bristol cannot be affected by any suggestion that BANES falls outside the remit of the Bristol HMA. • This is important in the context of the Hicks Gate location given that it straddles the boundary of Bristol City and BANES. Hicks Gate is promoted as an urban 	<p>consideration.</p> <p>Available evidence shows that there are two housing market areas across the West of England – the wider Bristol Housing Market Area and the Bath Housing Market Area. The Joint Spatial Plan covers the areas of all four West of England authorities and will include spatial options applicable to the whole plan area.</p> <p>The purpose of the Joint Spatial Plan is to consider through joint working the outputs of the Wider Bristol Strategic Housing Market Assessment alongside other evidence and technical studies, to test spatial options and to adopt a new formal sustainable strategic spatial framework that will guide the review and roll-forward of the unitary authorities' local plans.</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<p>extension to Bristol and represents the only contingency site for housing within the Bristol Core Strategy.</p> <ul style="list-style-type: none"> • It has always been the case that Crest Strategic Projects and Key Properties have sought to consider the area's potential devoid of LPA boundaries. It would be a continued frustration if BANES fails to engage positively in that process if it were to consider itself 'outside of the Bristol HMA'. 	
083	<ul style="list-style-type: none"> • Believe there should be a forum set up of civic and transport groups across the City Region. • Consultations should also take place with disabilities and equalities groups. <ul style="list-style-type: none"> • Would like to see housing and employment growth in these areas around rail corridors, the Henbury loop, Avonmouth/Severn Beach/Pilning, Charfield, Wotton Under Edge with a new station rural housing and employment development, Yate, Emersons Green linked to MetroBus and rail improvements at Yate, growth at Thornbury with MetroBus and rail improvements, Clevedon, Portishead, Pill, Long Ashton, Flax Bourton, Whitchurch urban extension MetroBus and rail improvements, Nailsea and Yatton MetroBus and rail improvements, Brislington, Stockwood and Keynsham MetroBus and rail improvements, Bristol City Centre, Newbridge Bath urban extension, Radstock, Midsomer Norton, Peasedown St John, Chilcompton and Shepton Mallet, Banwell, Winscombe and Burnham on Sea. 	<p>Public consultation and engagement will be carried out in accordance with the Statements of Community Involvement of the four unitary authorities. Details of the engagement process will be published. Would welcome opportunities to engage with such a forum of joint civic and transport groups.</p> <p>All potential spatial options will be considered and the whole process will be subject to a Sustainability Appraisal and statutory consultations.</p> <p>The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p> <p>The preparation of the Joint Spatial Plan will include an assessment of the strategic transport infrastructure</p>

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084	<ul style="list-style-type: none"> • The sub regions heritage assets as a strategic planning matter should not be left to a future detailed individual local authority policy consideration. • Character and heritage are critical place shaping considerations, assume that key local authority heritage, place, strategic landscape and design officers will be involved to help inform the strategic distribution of growth, the spatial strategy, strategic infrastructure and priorities. This will be particularly important in relation to the level of growth allocated to sensitive historic locations within the sub region particularly Bath, the central area of Bristol, and the numerous other significance historic landscapes, townscapes, conservation areas etc. 	<p>required to deliver new housing and employment land / floorspace.</p> <p>As a prescribed body under the Duty to Co-operate, English Heritage will be a key partner in the preparation of the Joint Spatial Plan as consideration of historic capacity will form part of the evidence of the Joint Spatial Plan.</p> <p>This will be addressed through the evidence base preparation which will be proportionate and robust. Historic and landscape character considerations will form part of the evidence base of the Joint Spatial Plan which will be subject to sustainability appraisal. The Joint Spatial Plan will be a formal development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This will be a strategic planning framework for the West of England and will inform local plan reviews. Its objective will be to identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region, the overall spatial strategy, strategic priorities, and strategic infrastructure necessary to deliver the spatial strategy.</p>

REF	SUMMARY OF KEY POINTS FROM CONSULTATION RESPONSES	COMMENTS
	<ul style="list-style-type: none"> • The initiation document raises a number of questions: • How can the JSPS harness the benefits of growth and related infrastructure investment to improve the condition and enjoyment of the sub regions cultural heritage and historic places? • How can the JSPS reflect the value of the historic environment to the future West of England economy? • Will the JSPS identify the land where development would be inappropriate, for instance because of its environmental or historic significance (NPPF para 157)? • Due to the limited capacity of Bath (World Heritage Site) (for example) to expand, it will be important for all four authorities to work together to ensure an ability to accommodate suitable and deliverable growth informs an appropriate spatial distribution. • Might the Duty to Cooperate and a limited capacity of Bath also suggest the logic of a single Strategic Housing Market Assessment area rather than separate Bristol and Bath SHMA's (JSPS para 8)? 	<p>Available evidence shows that there are two housing market areas across the West of England – the wider Bristol Housing Market Area and the Bath Housing Market Area. The Joint Strategic Plan covers the areas of all four West of England authorities and will include spatial options applicable to the whole plan area.</p>