

***West of England Joint Spatial Plan
Development Plan Document
Publication Draft***

***Report of Engagement and Main
Issues Raised***

October 2017

Appendix E

Report of Engagement and Main Issues:

1.0 Introduction, purpose and context

1.1 This statement has been produced in support of the West of England Joint Spatial Plan DPD Publication draft. It outlines how the 4 Unitary Authorities of Bristol, Bath & North East Somerset, North Somerset and South Gloucestershire have sought participation from communities and stakeholders during the preparation of this Plan, the main issues raised through the public engagement undertaken and how these issues have been taken into account. It covers the period from November 2015 – September 2017 and addresses the following in accordance with the Town & Country Planning (Local Planning) (England) Regulations 2012 – Reg. 22 (1) (C) (i-iv):

- Which bodies and persons were invited to make comments;
- How those bodies and persons were invited to make comments;
- A summary of the main issues raised; and
- How the 4 Councils have taken comments made into account.

1.2 The report provides an update from the two previous Consultation Reports prepared; the JSP Issues and Options consultation in November 2015 to January 2016 and the JSP Towards the Emerging Spatial Strategy November 2016 to December 2017. These documents can be viewed <https://www.jointplanningwofe.org.uk/consult.ti/JSPEmergingSpatialStrategy/consultationHome> and, together with this report, provides a full summary of the consultation and engagement, main issues raised and the 4 Council's response throughout the duration of the plan's preparation.

1.3. This report deals with the engagement activities in Part 1 and the main issues arising and how the Councils have responded to them in Part 2.

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Part 1: Engagement undertaken as part of Regulation 18 consultations

This section of the report sets out the key activities which have taken place up to September 2017. It does not list all the informal conversations, meetings and correspondence. This consultation and engagement has been carried out in accordance with Regulations of the Town and Country Planning (Local Planning) (England) Regulations 2012. This has been undertaken in accordance with the 4 Council's adopted Statements of Community Involvement (SCI).

Compliance with the Duty to Co-operate (DtC)

Through the creation of the JSP and the method of joint working the 4 Councils are able to demonstrate that the legal obligation of co-operation on strategic matters is satisfied. This report also serves to detail the ongoing engagement with our DtC contacts which has continued to take place in support of the preparation of the Joint Spatial Plan for the West of England.

Key consultation milestones in the Plan's preparation

The table below demonstrates an overview of all the key consultation milestones in the Plan's preparation to date. Previous key engagement on the plan (November 2016 to December 2017) can be viewed in more detail within JSP Towards the Emerging Spatial Strategy and Transport Vision Consultation Report March 2017 which can be accessed https://www.jointplanningwofe.org.uk/gf2.ti/-/756738/25692261.1/PDF/-/Joint_Spatial_Plan_and_Transport_Study_Consultation_Report.pdf

Date	Activity
January 2015	Publication of JSP Pre-Commencement Document
January 2015	Emails and letters sent out to everyone on the 4 Council's Local Plan databases (approx. 10,000 names) informing them of the start of the Plan's preparation, the purpose of the JSP.
March 2016	Publication of the responses made to the JSP Pre-Commencement Document and West of England response to matters raised.
November 2015	JSP Issues and Options Launch event held at University of West of England
November 2015	Emails and letters sent out to everyone on the 4 Council's Local Plan databases (approx. 10,000 names) informing them of the start of the Plan's Issues and Options consultation.
November 2015	Town and Parish Council, MP and Joint Forum Briefings
November 2015 to January 2016 Regulation 18 consultation offline and Online channels utilised during the consultation comprising	Series of exhibitions and drop in events held across the West of England to promote and publicise the JSP Issues and Options. Single website for all consultation documents and redirects from each UAs websites Supporting documents, collateral and materials to facilitate greater engagements.

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	<p>Social media channels including Facebook and Twitter to promote the consultation and regional exhibition events Press releases issued on behalf of the 4 Councils and media coverage on TV and radio channels to raise awareness, encourage responses and allow people to participate.</p> <p>Heads of Planning Policy presented to an audience at the University of the West of England – January 2016, to engage the younger communities of the West of England in the Joint Spatial Plan process.</p>
May 2016	Letters to Neighbouring Authorities to understand the opportunities through the Duty to Cooperate to work with neighbouring authorities in order to meet some of the wider Bristol housing need should the evidence show that we are unable to meet it in full.
June 2016	Louise Fradd and, Directors of Development and Heads of Planning from the four unitary authorities met with Business West – June 2016
August 2016	Letter to the Strategic Solutions Panel including key government departments; the Environment Agency, Natural England, WENP, HCA and key infrastructure providers for the region) seeking to re-affirm our commitment to engage effectively with stakeholders and organisations and ask for feedback on the previous consultation process.
November 2016	JSP Towards the Emerging Spatial Strategy launch event held at Watershed Bristol
November to January 2017 Regulation 18 consultation offline and Online channels utilised during the consultation comprising	<p>Four themed workshops across the West of England region held with targeted stakeholder audiences to discuss the key issues in the JSP.</p> <p>Six business consultation events were held with the support of Business West</p> <p>Bristol Avon Catchment Partnership briefed at meeting held on 30th November</p> <p>15 local consultation drop in sessions were held across the West of England</p> <p>Single website for all consultation documents and redirects from each UAs websites www.jointplanningwofe.org Supporting documents, collateral and materials to facilitate greater engagements – summary flyer, Frequently asked</p>

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	<p>questions, Office banners, posters to promote regional location drop in events</p> <p>An audience friendly illustrative video explaining the JSP Social media channels including Facebook and Twitter to promote the consultation and regional exhibition events</p> <p>Press releases issued on behalf of the 4 Councils and media coverage on TV and radio channels to raise awareness, encourage responses and allow people to participate.</p> <p>Written comments invited from statutory providers e.g. Wessex water, Bristol water, Western Power as part of Emerging Spatial Strategy consultation</p>
April 2017 onwards	<p>Officers from the JSP technical teams provide an update on the incorporation of Green Infrastructure within the JSP. Invited officers were from; Environment Agency, Natural England, Wessex Water, the Local Nature Partnership and Avon Wildlife Trust.</p> <p>Fortnightly meeting with the West of England Local Nature Partnership to discuss delivery of green infrastructure frameworks for the JSP</p> <p>Meeting Natural England officers to discuss the Habitat Regulation Assessment (HRA): Officers have met with Amanda Grundy and Simon Stonehouse to review the HRA process for the JSP throughout 2017 as we prepared the regulation19 Plan. Natural England have also been in communication with the local authorities throughout the plan process.</p>
May 2017	<p>Resilience Adaption workshop held 8th May 2017: Invited members of the key infrastructure provides for the region. This meeting was coordinated and chaired by Wessex Water to review issues of water and environmental resilience and the implications of the JSP.</p>
May/June 2017	<p>Specific WoE Affordable Housing stakeholder consultation via survey, building on research carried out by Bristol CC and National Housing Federation in Autumn 2016, resulting in high level assessment of capacity and appetite of Registered Providers to deliver Affordable Housing within the JSP period.</p>
June 2017	<p>Strategic Solutions Panel meeting held 29th June 2017:</p>

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	A presentation and series of round table discussions held to review the Emerging JSP policies with key stakeholder organisations.
June 2017	Meeting with digital infrastructure providers – VirginMedia, Hyperoptics and Openreach to discuss delivery of services when providing for large housing and employment sites
July 2017	Further written consultation with statutory providers e.g. Bristol Water, Wessex Water, Western Power, Wales and West Utilities regarding emerging SDL locations and capacities.
September 2017	Bristol Avon Catchment Partnership meeting held 12 th September 2017. Officers from the Joint Spatial Plan team attended this meeting to provide an update on progress and discuss key environmental issues across the region
September 2017	TPCA hosted bespoke workshop for 4 Councils entitled ' <i>How can Councils secure the delivery of more affordable homes? New models, partnerships and innovation.</i> ' The session was held to run through the findings of TPCA nationwide project to understand new innovation in address housing need and facilitate a discussion about how new approaches identified could be relevant in the West of England.

PART 2: 6.0 Summary of Main Issues Arising from Regulation 18 Consultation

This section sets out the main issues raised through consultation on the 2016 Towards the Emerging Spatial Strategy and how these have been used to inform the preparation of the JSP Regulation 19 Publication Plan. In total over 1,500 people representing a wide range of stakeholder groups responded. A more detailed report setting out the consultation responses is contained at pages 30 – 122 of the JSP Towards the Emerging Spatial Strategy and Transport Vision Consultation Report March 2017.

The statement below is a summary of how the questions appeared within the Plan and covers the following:

- Number of respondents to policy;
- Main issues raised;
- How main issues raised have been taken into account by the Council in preparing the 2017 Proposed Submission JSP Plan

Question 1 Does the proposed strategy make adequate provision to address the housing needs of the West of England?

765 people responded to this question.

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The majority of respondents felt the number of homes planned for was adequate, this view was mostly expressed by residents (80% of those that responded), local companies/organisations, local interest groups, development sector respondents and parish/town Councils. The majority of local residents considered the housing needs to have been over estimated but several respondents considered not enough housing was proposed. These respondents were largely from the development sector and business community and their comments included that an uplift in housing numbers is required to meet housing needs and in order to have an impact on overall levels of affordability.

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

The assessment of need remains robust and is accordance with national guidelines. In light of the identified need, and the comments received, the provision of housing in the Plan has been reviewed. The 4 UAs have concluded that the strategy not only makes provision to meet the assessed need but also provides flexibility to facilitate delivery. Furthermore, a contingency has also been identified if it becomes evident at review that there has been under delivery. Whilst seeking to plan positively and boost the supply of housing, the strategy enables annual delivery rates to be increased by over a third from around 4,000 to 5,127 homes pa, the 4 UAs have been careful to plan for sustainable development, recognising the high quality environment and the need to take account of national Green Belt policy.

Question 2 How can we increase the delivery of homes, in particular much needed affordable homes in the West of England?

Over 700 responses were made to this question

There was acknowledgement of the agreed need for Affordable Housing (AH) as a critical issue and the need to build more AH for young people. Several developers also considered the affordable housing target should be higher, other comments and suggestions on delivery of affordable housing included:

- Enforce a minimum target on a region wide basis to ensure the Affordable Housing need of 32,200 dwellings is delivered.
- Only grant permission where the target AH % is agreed
- Affordable housing requirements must be enforced and developers should not be Allowed to renegotiate provision once permission has been granted;
- The councils should be proactive in challenging viability assessments to ensure that planned levels of affordable housing are achieved.
- The Plan should identify potential ways in which the demand for affordable homes can be met;
- There should be development of homes by public bodies;
- Authority owned land should be used solely for affordable housing.

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- The need for affordable rental housing;
- The need for such homes to be high quality and energy efficient.

Most comments (170 responses) suggested reviewing the ways in which the planning process could be utilised and/or amended. Responses to enhance the process included:

- Speeding the planning process up through new policy in the JSP
- Adding a Planning Policy context for the delivery of 'garden villages' considered as capable of delivering housing at high delivery rates.
- The need for developers to set delivery rates.
- Promoting benefits for developers to develop their sites at an increased rate.
- Imposing penalties for failure to deliver
- Focus development in areas where infrastructure investment is already taking place
- Enforcement of planning agreements
- Supported a more diverse mix of development opportunities
- Making better use of existing empty dwellings.
- Addressing the 5-year supply issue,
- Innovative construction solutions (e.g. modular housing) which can be built quickly and efficiently.
- Potential new funding options from the devolution deal

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

The SHMA evidences a need of 32,200 affordable homes in the West of England in the period 2016-2036. This equates to 31.5% of the total housing requirement of 102,200 dwellings, and an annual requirement of 1,610 affordable homes. Of the 32,200 affordable homes needed, 29,100 are required in the Wider Bristol Housing Market Area and 3,100 in the B&NES Housing Market Area.

The JSP Towards the Emerging Spatial Strategy (TESS) November 2016 recognised the challenge involved in achieving provision to meet this level of need and estimated that some 17,100 traditional Affordable Homes (53%) could be delivered through the planning system against this level of housing need.

This position and the options available to address this were set out in the Officer response to the TESS document

In preparing the Publication Plan and in response to the comments raised, the 4 Councils have focused on two key issues;

- a) the need to substantially increase the overall supply of affordable housing from all sources due to the high level of need for Affordable Housing and the shortfall in past delivery rates,
- b) the spatial disproportionality of affordable housing needs to address the issue that majority of the Affordable Housing need is derived from Bristol, however this

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cannot be provided within Bristol because the scale of the need is too great, the availability of suitable sites is limited, and many residential sites in Bristol have high redevelopment costs due to their brownfield status.

Whilst it is recognised that the identified need for Affordable Housing has not been fully met, the strategy has been to entail a substantial boost in the supply of Affordable Housing for the sub-region and to achieve a step change in provision.

This is given policy framework expression in JSP Policy 3 of the JSP Publication Plan which focuses on:

- i. establishing the Affordable Housing Target of 24,500 net new affordable dwellings for 2016-2016.
- ii. maximising the provision of Affordable Housing as far as possible, making it a priority in the formulation of the spatial strategy.
- iii. in light of the particularly substantial need for Affordable Housing in Bristol, the provision of Affordable Housing on the SDLs and other strategic locations within or well-related to the Bristol urban area must contribute to the affordable housing needs of Bristol via on-site provision with the option of off-site contributions in locations less-well related to Bristol.
- iv. Delivery mechanisms will be determined through Supplementary Planning Document(s).

In preparing the JSP it has also been recognised that in order to maximise the delivery of Affordable Housing the four Councils continue to work proactively together and with partners to explore other mechanisms and opportunities in addition to the planning system.

Question 3 Does the proposed strategy make adequate provision to address the economic and employment needs of the West of England?

Over 600 responses to this question were received.

Multiple responses (75 comments) agreed the Emerging Spatial Plan makes adequate provision to address economic and employment needs. Reasons for agreement included:

- Recognition of the alignment with the Strategic Economic Plan (SEP), and focus on the Enterprise Zones and Areas and South Bristol.
- Rebalancing of employment growth away from the communities in the North Fringe of Bristol was welcomed in helping to address inequality issues in South Bristol.
- Emphasis on urban living may result in the loss of existing employment sites.

The majority of responses (338) disagreed that the Emerging Spatial Plan makes adequate provisions to address economic and employment needs and suggested that the employment offer was limited locally. Additional comments and challenges to the employment strategy included:

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- Lack of employment opportunities in areas proposed for housing
- That the strategy does not address the longstanding economic problems in South Bristol and Weston-super-Mare by focusing investment in both employment and housing in these areas.
- It does not accommodate the economic growth objectives of the Local Enterprise Partnership Strategic Economic Plan (SEP).
- Views that key businesses in the area need to be formally recognised.
- The plan focused more on housing instead of employment opportunities.

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

The Economic Development Needs Assessment (EDNA) provides evidence that there is existing employment land sufficient to deliver strategic employment needs and the anticipated jobs growth over the period to 2036.

Comments submitted on the distribution and availability of employment land for development have been noted and the 4 Councils have responded by the inclusion of direct reference to the role and strategic significance of:

- a) existing town and city centres
- b) Enterprise Zones and Areas

In providing for employment growth and additional growth opportunities at key infrastructure locations:

- c) the Port, Airport and Oldbury new nuclear power station

Where appropriate, and in relation to scale of development and existing employment provision, the new Strategic Development Locations will also make provision for employment land.

Note that the Local Plans will continue to make provision for employment in local town, district and business centres.

Topic paper x Employment provides further evidence on this issue.

Question 4 Does the preferred strategy and the locations identified meet the plans strategic priorities and vision?

There was support for the Vision, the Strategic Priorities and their spatial implications from a number of development sector bodies and government agencies, but with some caveats.

Some respondents considered certain proposed Strategic Development Locations to be unsustainable and contrary to the strategic priorities and vision set out in the Emerging Spatial Strategy. Some respondents stated that the Vision did not highlight the need to

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address service and infrastructure requirements or recognise the importance of smaller sites in delivering the whole Vision for the JSP.

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

There were a wide range of stakeholder viewpoints, which is evidence that there was not a consensus view on what the Vision or plan priorities should be. However, the comments received have been taken into account and used to make adjustments to the Plan's critical issues and strategic priorities.

These are now presented in a table format in the Publication Plan which emphasises a commitment to set out a policy framework that addresses the following:

- To substantially boost the housing supply, particularly affordable housing of which the need is acute, across the Plan area by establishing an overall housing and affordable housing requirement to be delivered in accordance with the Plan's spatial strategy.
- To promote inclusive economic growth which accommodates the economic growth objectives of the LEP Strategic Economic Plan in accordance with the Plan's spatial strategy and thereby ensures that benefits of economic growth are shared more equally.
- To promote sustainable growth the form and function of development should not seek to replicate past patterns of development and settlement patterns that are over-reliant on the private car and should be properly aligned with infrastructure and maximise opportunities for sustainable and active travel.
- Through a place making approach promote places of density and scale with a range of facilities, which integrates high quality multi-functional green infrastructure which encourages healthy lifestyles, cultural wellbeing and ensures resilience to the impacts of climate change.
- Delivering economic growth needs to be balanced with recognising that the sub-region benefits from a world class environment. This brings substantial economic and community benefits and contributes to the quality of life of residents, visitors and businesses by enhancing the quality of the natural, built and historic environment and achieving biodiversity gains which are recognised as outcomes as part of achieving sustainable patterns of development.

Question 5 Are there any reasons why this strategy or identified locations could not be delivered?

Approximately 1,400 respondents answered this question.

Many comments on the Strategic Development Locations were strongly steered towards transport issues. Responses on this included:

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- Houses need to be located in locations where infrastructure is in place to support development
- The JSP should choose locations with good transport links to employment opportunities.
- Impact on the environment
- References to other infrastructure:
 - Potential pressures added to local schools, hospitals and GP surgeries, which are currently inadequate to support the population and creating an issues for delivery of Strategic Development Locations (SDLs).
 - The need to spread development over more SDLs increasing delivery as fewer 'major' infrastructure improvements would be required.

A further 100 locations were put forward through the call for sites exercise that supported the JSP consultation. From the sites submitted, the majority of these were new and some were resubmitted by respondents from the previous issues and options consultation. These will be considered as part of the next round of technical work to support the preparation of the draft JSP.

In relation to the SDLs it should be noted that the responses were influenced by the interests of those responding. Within consultations of this nature, it is anticipated that the views are not wholly representative of the population and residents of these areas may react more negatively and promote alternative spatial options, in contrast to residents in areas that are not identified for development who are less likely to respond. Furthermore the development industry may promote sites that they own or control and may not provide a balanced view of the location as part of a comprehensive joint spatial strategy.

Green Belt: Views on this subject were mixed, several comments (60 responses) specifically outlined that Green Belt land should not be used however, various comments (50 responses) outlined the need to use more Green Belt land. Respondents from the development sector considered that a Green Belt Review is required and should consider appropriate releases of Green Belt land in and around sustainable settlements, including consideration of the inseting of settlements. Several respondents also raised the issue of Green Belt exchange in relation to development on the edge of Bristol.

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

The clear message from the consultation, particularly from our communities, was that it was essential that new development was delivered in step with the necessary infrastructure, particularly transport improvements. This is identified as a key element in the Publication version's proposed vision for the West of England and the principle integrated throughout the plan. In particular, the strategic infrastructure requirements policy sets out the broad principles with reference to the role of the Joint Infrastructure

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Delivery Programme and the Local Transport Plan in supporting delivery, while the specific SDL policies identify specific infrastructure requirements.

The potential development sites submitted were assessed and informed the evolution of the preferred spatial strategy through the two stages of consultation. The Issues and Options considered broad options which were refined through the Towards the Emerging Spatial Strategy Document. The latter also invited comments on alternative locations not proposed for inclusion in the Plan. For the majority of the proposed locations the development industry response provided reassurance that the SDLs were realistic and deliverable and that they could be taken forward into the Publication version. This engagement with developers and landowners helped to inform the detailed policies proposed for each SDL. The overall conclusion from the consultation was that the JSP needed to present a range of different development opportunities of different types and in a variety of locations to provide flexibility and choice across the plan area.

The Green Belt issue divided opinion with views strongly made in support and against both in respect of affected communities and developers promoting land. This debate has helped to inform the JSP spatial strategy. This maintains the importance and value of the Green Belt as a whole, whilst recognising that exceptional circumstances have been made to warrant land to be released from the Green Belt to support sustainable growth in some specific locations.

Question 6 Is the preferred spatial strategy the most appropriate strategy when considered against the reasonable alternatives?

Over 800 respondents answered this question.

Over half of the respondents thought the Emerging Spatial Strategy presented in this consultation was not the most appropriate strategy or that they had reservations about the strategy. Many of these were in respect of one or more of the strategic development locations as opposed to the overall strategy. Some (70) respondents were in agreement that the preferred spatial strategy was the most appropriate, albeit some with reservations. As noted above some views were clearly influenced by the interests of those responding and by a specific strategic development location as opposed to how the Emerging Spatial Strategy performs as a whole.

The majority of respondents considered there were reasons why the strategy could not (or should not) be delivered. The most common general reasons given for the strategy being considered undeliverable included:

- The resulting pressure on transport infrastructure (mentioned approx 1000 times), including that the necessary transport infrastructure is undeliverable
- Pressure on other infrastructure (mentioned over 700 times).

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- An unsustainable strategy (raised nearly 350 times) i.e. would not meet the tests of environmental, and/or economic and/or social sustainability.

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

The formulation of and justification for the preferred spatial strategy is set out in Topic Paper 2 and is summarised in the JSP. This explains how the 4 UAs have assessed the evidence and sought to formulate the most appropriate strategy to achieve the agreed priorities. Development is steered to locations which minimise the harm to the environment whilst providing scope for enhancement, and which provide a deliverable strategy. In light of the concerns expressed about delivery of the transport infrastructure needed, particular effort has been directed to ensuring its deliverability, both technically and its funding.

The preferred spatial strategy reflects the need to find as balance; it enables the identified growth needs of the West of England to be met in a sustainable and deliverable way, properly aligned with new infrastructure and with flexibility. It enables the retention and enhancement of the sub-region's high quality environment, provides benefits to existing communities and it facilitates the development of exemplar, sustainable new places. This is the most appropriate strategy for the West of England as evidenced through Sustainability Appraisal (SA) testing and in delivering the Plan's spatial priorities.