

Examination of the West of England Joint Spatial Plan

Inspectors: Malcolm Rivett BA (Hons) MSc MRTPI and Steven Lee BA (Hons) MA MRTPI

Programme Officer: Robert Young

Lisa Bartlett, Senior Responsible Officer,
West of England Combined Authority,
Engine Shed,
Station Approach, Temple Meads,
Bristol, BS1 6QH

1 August 2018

Dear Ms Bartlett,

Examination of the West of England Joint Spatial Plan

Thank you for your letter of 23 July 2018.

Additional Evidence Base Work

We note the additional evidence base work/documents which the Councils are proposing to prepare/commission in respect of the Duty to Co-operate, the Habitats Regulations Assessment (HRA), Sustainability Appraisal (SA) and Affordable Housing requirements. It perhaps goes without saying, but it is obviously of crucial importance that this work (particularly that in relation to HRA and SA) is carried out with an "open mind" and does not seek to simply justify the approach/policies currently set out in the draft plan.

The summaries of the work to be undertaken appear to cover the significant points we have raised to date. However, in respect of the SA work we would again emphasise that it is important that the Councils consider whether there are any, as yet untested, reasonable alternatives to any element of the plan and if they judge that there are not that an explanation of this is provided. Also, does the summary of work proposed to be undertaken include that which, prior to our initial letter, the Councils themselves indicated to us they are intending to carry out?

Strategic Development Locations

We note the Councils' wish to retain, as formal development plan policy, the specific criteria and requirements listed for each of the Strategic Development Locations (SDLs). We, of course, commit to adopting a proportionate approach to our examination of the soundness of these criteria/requirements, having regard to national policy/guidance, the evidence submitted by the Councils and the representations of other Examination participants. However, in the light of your most recent letter we are now somewhat confused as to the Councils' position and intentions concerning the paragraph 66 "starting point" and "will evolve" wording in relation to these criteria/requirements. We do not seek an immediate answer to this, but request that the Councils consider the point and make clear their intentions in this respect at the time of the publication of the additional evidence base work.

To assist us in identifying the key issues for soundness and to minimise, as far as possible, the amount of hearings time it takes to consider these criteria/requirements, it would be helpful if for each of the SDLs a short paper is produced to briefly, but specifically, summarise the justification for each of the policy 7.1 – 7.12 criteria and requirements. We appreciate that much of this evidence may already have been submitted across a number of separate documents. However it would assist us, and no doubt all participants, for the justifications for each SDL criteria/requirement to be set out in one document. The justification could, of course, include cross-references to other documents (ideally to specific sections/paragraphs) and, as we have previously indicated, needs to reflect the fact that the plan does not define boundaries for the SDLs.

We appreciate that it may appear that we are requesting a significant amount of additional work to be undertaken. However, we understand from the Councils that this evidence either exists or is in preparation and, if the papers were not to be prepared at this stage, it is very likely we would request them in due course anyway as part of the Councils' response to our list of Matters/Issues/Questions. Preparing them at this point, and making them available for comment along with the other additional evidence base work, will assist in focusing the issues requiring detailed discussion at the hearings. We do not anticipate this work having a significant effect on the timetable you have proposed.

Timetable for the Examination

The timetable for the remainder of the Examination you set out in your letter appears broadly realistic. However, you will appreciate that, at this stage, we cannot formally commit to the indicated dates for the publications of Matters, Issues and Questions or for the start of the hearings. These will depend on a number of factors including the earlier deadlines in the timetable being met, the volume and nature of the additional evidence work and the comments on it, our availability, the Programme Officer's availability and any other events/circumstances which may arise. Nonetheless, we are committed to

progressing the Examination as quickly as possible and we hope that we can begin to firm-up dates once the proposed consultation is underway.

As always we would be grateful for this letter to be posted on the Examination website, although we are not seeking, or envisage accepting, comments on it from other parties. Additionally, it would be helpful if a brief statement is posted on the website to inform people at a glance the current situation with the Examination – ie that the Councils are currently preparing additional evidence base work on which they envisage consultation taking place in November 2018.

Yours sincerely,

Malcolm Rivett and *Steven Lee*

INSPECTORS