



West of England Joint Spatial Plan

November Consultation Explanatory Note



NOVEMBER 2018

WED 001

Lisa Bartlett
SRO for the JSP
9 November 2018

Robert Young
JSP Examination Programme officer

Dear Robert,

West of England Joint Spatial Plan: November 2018 JSP Technical Evidence Work Consultation

We are writing to confirm the content of the documents being published for the further JSP consultation on the 12th November 2018. The full list of JSP related documents (WED 001 to WED 010) are set out in the table below and are published on our JSP website at www.jointplanningwofe.org.uk.

These documents are in response to requests by the Inspectors for further information, and to present technical reports that further support the JSP.

In keeping with our approach through the preparation of the JSP and to ensure a full and fair opportunity for consultation these technical documents (other than the HRA update) will be made available to the public for comments from 12th November 2018 until 7 January 2019, a period of eight weeks. With regard to the Consolidated Sustainability Appraisal and the Habitats Regulation Update, the consultation is undertaken pursuant to regulation 13(2)(b) of the Environmental Assessment of Plans and Programmes Regulations 2004 and regulation 105(3) of the Conservation of Habitats and Species Regulations 2017 respectively.

Whilst we have endeavoured to have all the technical reports available at the same time, there will be a short delay to the publication of the HRA update which will be made available by 26th November, and consultation on this further report will also close on 7th January 2019. This will ensure that a six week consultation period will take place on this document.

We have contacted everyone on the JSP database advising of the consultation and how to make comments. Hard copies of the documents have been placed at each of the four Councils' formal deposit locations and we will also undertake appropriate press and media coverage in accordance with our agreed protocol.

After the consultation, the Councils will prepare a schedule of key issues and a brief indication of the Councils' responses to them, as requested. These key issues reports will be circulated to the Inspectors for consideration.

The Councils considered it would also be helpful to set out a high-level summary of the conclusions of each of the documents, along with the reasons for why each has been published (please see below).

Reference	Document
WED 001	November Consultation Explanatory Note (Nov 2018)
WED 002	Schedule of Proposed Changes (Nov 2018)
WED 003	Duty to Cooperate Paper (Nov 2018)
WED 004	Justification of the Requirements for the 12 Strategic Development Locations in Policy 7-7.12 (Nov 2018)
WED 005	Updated Viability Assessment (Nov 2018)
WED 006	Updated Employment Evidence (Nov 2018)
WED 007	Transport Topic Paper 8 (update Nov 2018)
WED 008	Emerging Findings Transport Report (Nov 2018)
WED 009	Consolidated Sustainability Appraisal (Nov 2018)
WED 010	Updated Habitat Regulations Assessment (Nov 2018) (to be published 26 th Nov 2018)

Yours Sincerely,

Lisa Bartlett
SRO JSP

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WED 002: Schedule of Proposed Changes (Nov 2018)

This Schedule includes proposed changes to the JSP in response to the Inspectors' request for greater clarity in the JSP on two matters. The paper proposes the changes to the Reasoned Justification to clarify:

- The respective roles of the JSP and the Local Plans and the factors which the Local Plans would need to consider in respect of deleting land from the Green Belt and exceptional circumstances.
- Changes to JSP Para 66 to clarify that the Strategic Development Location requirements are policy which will be applied to development proposals and Local Plans will need to conform with the JSP.

We have also incorporated within the Schedule the additional consequential changes we suggest should be made to Policies 7.1 to 7.12 which reflect the ongoing work we are undertaking on the SDLs.

We would also like to take this opportunity to advise the Inspectors that some additional changes may be required following the completion of the HRA.

WED 003: Duty to Cooperate Paper

This paper was requested by the Inspectors' letter of 28th June (ED02) to demonstrate how the councils have met the Duty in preparation of the Plan. The paper appends Statements of Common Ground (SoCG) with the authorities that adjoin the West of England.

The paper confirms that the legal obligation under Section 33A of the Planning and Compulsory Purchase Act 2004 has been met through:

- The approach to joint working between the 4 councils to prepare the JSP.
- Engagement with the adjoining authorities that border WoE and the supporting SoCG which demonstrate that adjoining authorities have raised no in principle Duty to Cooperate issues.
- The WoE councils have not required any housing growth to be located beyond the WoE authorities, nor that the WoE authorities are requested to accommodate any growth from adjoining councils.
- Engagement statements with prescribed bodies confirming they have contributed to the delivery of the JSP.

WED 004 Justification of the requirements for the 12 Strategic Development Locations in Policy 7.1 - 7.12 (Nov 2018)

This additional work was undertaken to address matters raised by Inspectors in letter of 28th June (ED02).

The Schedule confirms that the 4 councils have:

- Provided a brief rationale for the 12 SDL site requirements.
- Specified the source/evidence of the justification of the requirements.
- Where appropriate, suggested some suggested revised wording for Inspectors' consideration.

WED 005 Updated Viability Assessment (Nov 2018)

This additional technical work has been undertaken to address the Inspectors' questions in their letter of 28th June (ED02) on the viability evidence supporting Policy 3.

The updated report confirms:

- The study has involved a comprehensive assessment similar to that expected for Local Plan viability but necessarily and appropriately using a high-level approach.
- Given the variety of potential development scenarios across the sub-region, there are a wide range of results from the general typology tests.
- There is a reasonable prospect of the JSP development types and identified quantum of affordable housing (24,500 homes) being delivered, bearing in mind the range of likely sites and opportunities overall, as well as the probable challenges and constraints.
- In various circumstances and contexts there may be external sources available to support funding gaps.

WED 006 Updated Employment Evidence (Nov 2018)

This report has been prepared to respond to issues raised in the Nov 2017 consultation on the JSP and supporting evidence regarding employment land.

Analysis of evidence:

- indicates there is substantial capacity across the WoE to meet short term needs and no threat to the health of the economy through a constrained supply position.
- Identified the supply of B Use Class sites and premises is sufficient to meet the identified requirements across the JSP plan period.
- identified sufficient supply to accommodate:
 - the JSP jobs growth target and provide for replacement requirements
 - a c.4% surplus to deliver enhanced range and choice in the supply portfolio.

- identified that development enables the provision of new premises which are attractive to the market and suited to modern occupier needs in terms of type and location.
- confirmed that from an assessment of historic completions profile, there is a reasonable basis for planning for employment growth when considering a 100,000 jobs scenario.

WED 007: Transport Topic Paper 8 (update Nov 2018)

This Transport Topic Paper updates [SD 16A Topic Paper 8: Transport \(published in April 2018\)](#) and builds on the technical evidence from the Joint Transport Study (SD16B). It sets out further information on the transport issues, the rationale for the transport programme, costs, impacts and delivery case. It demonstrates that it is possible to deliver a transport programme that effectively addresses the issues, is feasible, has a reasonable prospect of funding and has robust delivery mechanisms in place.

WED 008: Emerging Findings Transport Report (Nov 2018)

This report provides transport information to support the West of England Joint Spatial Plan. It is based on technical studies which examine the transport issues and develop and assesses potential interventions to support the delivery of the spatial strategy in the Joint Spatial Plan. The technical studies relate to a series of geographical packages within the West of England and will be used to inform the development of the Local Plans for the four authorities. The studies follow the DfT Transport Appraisal Process, and focus on the following:

- Identification of key transport challenges and transport objectives in the areas of interest;
- Identification and shortlisting of potential transport options to address the challenges and objectives;
- Concept design and initial costing of shortlisted options;
- Desk-based assessment of environmental, social and economic impacts, and value for money of the options; and
- Initial assessment of the financial and delivery case of the options.

WED 009: Consolidated Sustainability Appraisal (Nov 2018)

This additional SA technical work was undertaken to address matters raised by the Inspectors in their letters of 1st and 28th June (ED01/2) and to also ensure the SA complies

with regulation 12(2)(b) of the Environmental Assessment of Plans and Programmes Regulations 2004.

The consolidated and updated SA confirms that the Councils have met their obligation under the 2004 Regulations to prepare an Environmental Report and that in undertaking this the SA has:

- Appraised reasonable alternatives for the quantum of housing (and jobs).
- Re-appraised the spatial scenarios considered at Issues & Options stage.
- Provided an audit trail describing the reasonable alternatives considered and reasons for selecting or discounting them.
- Re-appraised Policies 1 to 7 of the JSP individually.
- Included a summary of the expected likely significant effects and reasonable alternatives in relation to the Publication version of the JSP.
- A description of the potential cumulative effects of the entire JSP.

No changes to the JSP are considered necessary as a direct result of this work.

WED 010: Updated Habitats Regulation Assessment (Nov 2018)

As explained above, an update to the previously published HRA (SD10A) is being undertaken to comply with 12th April 2018 Court of Justice of the European Union (CJEU) judgment concerning Habitats Regulations Assessments (HRA) as requested by the Inspectors' letter of 28th June (ED02). The Report is currently being finalised and will be published by 26th November.