



# West of England Joint Spatial Plan - Publication Representation Form

## Part B - Your Representation

Please use a separate form for each representation made and read the accompanying **Guidance Note** that accompanies this form before you complete it.

Name or Organisation:

**Q1. On which part of the Joint Spatial Plan are you commenting? Please see the note above.**

Chapter  Paragraph  Policy

Key Diagram

**Q2. Do you consider the Joint Spatial Plan to be:**

Legally compliant?	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
Sound?	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
Compliant with the Duty to co-operate?	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>

*Please tick as appropriate*

**Q3. Please give details of why you consider the Joint Spatial Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Joint Spatial Plan or its compliance with the duty to co-operate, please also use this box to set out your representation.**

1. The allocation of a Strategic Development Location (SDL) in Churchill parish is not in accordance with National Planning Policy (NPPF, Clauses 151 and 182) or with the strategic objectives of the JSP itself. (See Section 1.0 of the attached letter);
2. The proposed Churchill SDL is unsustainable from a transport and infrastructure perspective. There is extremely limited public transport accessibility to the area and consequently the highest car use in the region. The road infrastructure proposed is not only environmentally-damaging (as highlighted by WS Atkins) but unrealisable without significant central government contribution. (See section 2.0 of the attached letter);
3. The SDL is unsustainable from an employment perspective due to its remoteness from existing employment nodes and the likelihood that new business will not be attracted to the location. This situation is already apparent in Weston-super-Mare, where better located, more accessible land is not attracting employment to match housing growth leading to significant outward commuting to Bristol. (See section 3.0 of the attached letter);

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4. The proposed Churchill SDL is unsustainable from an environmental perspective. Apart from the massive increase in trip generation, the SDL damages the Mendip Hills AONB, increases flooding risk and destroys the biodiversity of high-quality rural land. (See section 4.0 of the attached letter);
5. By the admission of BNP Paribas, on behalf of the WoE Authority, the proposed Churchill SDL will be unable to contribute effectively to providing housing and/or affordable housing in the region, in accordance with central government policy. It is also unlikely that the planned housing numbers will be delivered in the SDL location within the plan period. (See section 5.0 of the attached letter);
6. Community involvement and consultation for such a significant project has been confusing and has been kept to a bare minimum, in breach of the principles set out in NPPF Policy 52. We assert that, based on a door-to-door assessment and a petition organised by CALRAG, the community is overwhelmingly opposed to the level of development proposed in the plan. (See section 6.0 of the attached letter).

**PLEASE SEE ATTACHED LETTER FROM CHURCHILL PARISH COUNCIL**

*Please continue on a separate sheet/expand box if necessary*

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**Q4. Please set out what modification(s) you consider necessary to make the Joint Spatial Plan legally compliant or sound, having regard to the matter you have identified at Q3 above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at Examination.) You will need to say why this change will make the Joint Spatial Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

The Churchill SDL should be entirely removed from the JSP. Housing numbers can be much more effectively met in sustainable locations, close to employment and public transport, on the fringes of Bristol.

It is proposed that allocation of a small portion of North Somerset's green belt land for development is far more sustainable and policy-compliant and that the special circumstances exist to justify the removal of 2% of North Somerset's green belt for the Vale development. The proposed Vale development can accommodate the relocated housing allocation from Banwell and Churchill in a more accessible location, reducing cost to government and enabling delivery of more affordable housing and better developer infrastructure and services contributions. Development of the Vale would also greatly improve the deliverability of the housing numbers in the plan as there is a developer already in control of the land. (see 'Alternative Development Locations' section of attached letter).

**PLEASE SEE ATTACHED LETTER FROM CHURCHILL PARISH COUNCIL**

*Please continue on a separate sheet/expand box if necessary*

***Please note*** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. ***After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.***

**Q5. If your representation is seeking modification, do you consider it necessary to participate at the oral part of the Examination?**

**No**, I do not wish to participate at the examination hearings

**Yes**, I wish to participate at the examination hearings

**Q6. If you wish to participate, please outline why you consider this to be necessary.**

Churchill Parish has a right to participate in an examination which will fundamentally and irreparably alter the character of the area.

*Please continue on a separate sheet/expand box if necessary*

***Please note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination.

**Name**

**Date**

**All representations must be received no later than Wednesday 10<sup>th</sup> January 2018**  
**Please keep a copy of this form for future reference.**