

(For official use only)

Rec'd:

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Respondent No:

## WEST OF ENGLAND

"BUILDING OUR FUTURE"

### West of England Joint Spatial Plan - Publication Representation Form

The West of England councils - Bath & North East Somerset, Bristol City, North Somerset and South Gloucestershire councils are inviting representations on the Publication Document of the West of England Joint Spatial Plan. These will be considered by the examining Inspector in the context of the soundness and legal compliance of the Plan.

**Please return this form by Wednesday 10<sup>th</sup> January 2018.**

**Email to:** [comment@jointplanningwofe.org.uk](mailto:comment@jointplanningwofe.org.uk) **or post to:** West of England Joint Spatial Plan, C/o South Gloucestershire Council, Planning, PO Box 1954, Bristol BS37 0DD

**This form has two parts:**

**Part A** – Personal Details

**Part B** – Your representation.

**Please fill in a separate sheet for each representation you wish to make.**

To ensure your representation is restricted to issues of soundness and legal compliance, you are advised to refer to the accompanying **Guidance Document** and make your representation on this official form that has been specifically designed to assist you in making your representation.

**Please be aware that all comments made on the Joint Spatial Plan will be publicly available.**

Anonymous forms cannot be accepted and so to submit your form you must include your details below.

You should refer to section 5 in the Guidance Document for advice on how to make a **joint representation**.

### 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

4

Paragraph

33-37

Policy

5, principles  
1 & 2

Key Diagram

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

Legally compliant?

Yes

No

x

Sound?

Yes

No

x

Bath & North East  
Somerset Council



## West of England Joint Spatial Plan - Publication Representation Form

Compliant with the Duty to co-operate? Yes

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.**

Most relevant to this are paragraphs 33-37.

**A requirement for provision of land for household or communal food growing spaces within or very close to new housing developments should be included in the policy. Also there should be a requirement that all new housing development provide adequate kitchen space for food preparation and storage.**

Without adequate provision of land for food growing within new housing developments, sustainability is compromised. Provision of such spaces, thus enabling households to grow their own food either as individual units or communally is fundamental to the integration of nature and biodiversity, food education especially for children, health and wellbeing for all through having access to gardening space. There is no reference to this in the JSP so the negative implication is that most new housing development will not have space for food growing. This is unsound and unsustainable. People have a right to grow food for themselves but if there is no land available, this right is not provided and is likely to be not legally compliant with respect to allotment law.

Similarly there is no reference to the design of kitchens that requires adequate provision of food preparation and storage space. The capacity, infrastructure and ability to prepare meals is an essential element of household level food resilience, health and wellbeing. Food security experts all around the world agree this; people should have the right to prepare good quality nutritious meals for themselves.

*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:**

Paragraph 35 should include the following wording: [creating accessible spaces to encourage physical activity **and in all new housing developments, providing spaces for household and communal food growing within or very close to the new housing developments.**

Paragraph 36 should include the following wording at the end: **For example, all new housing developments must provide adequate kitchen space for food preparation and storage within each home.**

Paragraph 37 should include the following wording: [variety of services and facilities including access to green space and nature **and food growing spaces.**

*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.**

I believe the points I have made to be essential to the sustainability of the JSP. If my participation at the hearing is the only way to ensure it is included, then I wish to attend to make this happen.

*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** Joy Carey

**Date** 10 Jan 2018

**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.