

**Summary of CPRE Avonside recommendations to the West of England JSP  
January 2018**

	Form
<p><b>Recommendation 1:</b> The JSP should be revised to integrate strategies for housing and employment by seeking to locate them in closer geographical proximity if not the same location and promote greater density and regeneration in the urban areas of the sub-region to reduce the need to travel.</p> <p><b>Recommendation 2:</b> The JSP should be revised using more realistic forecasts of growth in the region. Specifically, there should not be a rush to develop housing in the unsustainable locations the JSP identifies (detail of the reasons why these locations are unsustainable can be found in our submission relating to Policy 7). New housing and employment should be integrated and there should be greater focus on the opportunities to develop in our existing urban areas in order to encourage regeneration and integrate employment and housing.</p>	1
<p><b>Recommendation 3:</b> The JSP should be revised to be more realistic about the changes to transport and infrastructure that can be achieved, the constraints on improvements to rail networks and the implications of failing to achieve these improvements on the road network of the sub-region. If the JSP were to take a more integrated approach to the location of housing and economic growth in the sub-region then the need to travel would be reduced.</p> <p><b>Recommendation 4:</b> The JSP should seek to reduce air pollution and improve air quality in the sub region.</p>	2
<p><b>Recommendation 5:</b> Notwithstanding our comments relating to the need to reduce housing numbers in line with more recent forecasts of the economic growth of the region, the JSP needs to be revised to accurately use the information from the HMAs to allocate housing across the whole plan area. We specifically recommend that a new assessment of housing need in both HMAs is undertaken.</p> <p><b>Recommendation 6:</b> To meet its own vision and strategic priorities the JSP should identify opportunities to improve existing communities within the sub-region that are in need of affordable and better quality housing, where housing density can be improved and the area regenerated through new employment opportunities and public transport links.</p>	3
<p><b>Recommendation 7:</b> The JSP needs to be revised to reflect new forecasts for the economic growth of the sub-region. Specifically: Chapter 4, Para 2 should be amended to state “<i>The Spatial Strategy has been formulated to deliver the Objectively Assessed Need of 73,400 new homes, which is broadly in line with the Core Strategy</i>” Chapter 3, Para 3 should be amended to state “<i>the Spatial Strategy supports the delivery of 20,000 new jobs (using the OE baseline scenario)</i>”. A maximum of 54,000 new jobs if using the medium-high scenario. The spatial requirements of the plan will need to be amended to reflect this and the entire section 7 (new strategic locations) revised.</p>	4

<p><b>Recommendation 8:</b> The JSP should require further work on the brownfield registers in the four authorities and prioritise the use of these sites before any building begins in the countryside. Also, it should recognise that these registers are not static and that more brownfield land will become available during the lifetime of the plan. There should be a commitment to regenerating these as and when they become available rather than allowing them to deteriorate or an area degrade as a result. Opportunities to regenerate, increase density and improve the urban environment should be part of this approach.</p> <p><b>Recommendation 9:</b> The JSP should contain an indication of a hierarchy of areas, prioritising the high density opportunities in cities and major towns which have less landscape impact, and are more sustainable in terms of amenities and access to transport. We need clear phasing with indicative trajectories put into policy.</p>	5
<p><b>Recommendation 10:</b> The JSP needs clear definition of Garden Villages which sets how they will be delivered in line with Government policy; and how each of the proposed Garden Villages, and their locations, meet the Strategic Priorities outlined in the JSP.</p>	6
<p><b>Recommendation 11:</b> Given the scale of Green Belt loss both from roads and housing development proposed in the JSP, we recommend a full Green Belt review should be carried out that looks at the overall purpose of the Green Belt. This should be an overview, rather than the individual assessments that have been carried out so far, which is consistent across all four authorities. It should examine the case for exceptional circumstances, how proposed development locations would meet the plan's Strategic Priorities, and look for opportunities where the Green Belt could be positively enhanced for beneficial use.</p> <p><b>Recommendation 12:</b> The JSP should include strategic policies that plan positively to enhance the beneficial use of the Green Belt, as required in the NPPF para 81.</p>	7
<p><b>Recommendation 13:</b> WECA should reduce the numbers of housing and jobs to be created within the JSP in line with recent economic forecasts and better integrate strategic development locations with strategies to enhance employment in the sub-region. The starting point of the JSP should be the realisation of Policy 5 through the delivery of sustainable housing and employment opportunities, not the continued building of large dormitory housing estates from which residents will have to drive for their every need. To meet its own strategic priorities it should focus and give strength to LA's directing development to the areas that are most sustainable - urban areas (the core areas of Bristol, Bath and Weston-Super-Mare), but also towns and village within the existing boundaries of which measures should deliver regeneration and enhancement of the environment to enable the well-being and better provision of services for the people living there. Planning for investment in infrastructure should bring benefits to all residents of the West of England, not be prioritised for spending on moving people long distances between new and dispersed locations for employment and housing.</p>	8