



# Bristol Local Plan

Planning for strategic cross boundary matters:  
Progress report (November 2023)



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# Introduction and Background

- 1.1 Bristol City Council has been engaged in an ongoing process of co-operation with the authorities of Bath and North East Somerset Council and South Gloucestershire Council in relation to strategic matters, that cross the boundary between the authorities as shown on the map below, as relates to the preparation of their respective Local Plans.
- 1.2 This progress report has been prepared at this time in order to outline the strategic matters on which co-operation has taken place and the key outputs from this co-operation to date. In due course a Statement of Common Ground will be prepared that will be updated at each key stage of local plan preparation. An updated statement is expected to be published when the Bristol Local Plan is submitted for examination. This is expected to be in Spring 2024. It will be updated again at key stages in the preparation of the local plans of the three authorities.

## History of strategic cooperation

- 1.3 The three authorities and North Somerset have been cooperating for many years with the ambition of setting a strategic framework upon which new local plans will be based. In November 2017 the West of England authorities<sup>1</sup> published a joint strategy (West of England Joint Spatial Plan) which represented their agreement to address development needs across the West of England.
- 1.4 Whilst the Joint Spatial Plan was withdrawn in April 2020 following examination hearings, the process of cooperation continued into the preparation for a Spatial Development Strategy (SDS) for the West of England Combined Authority, a process which also saw continued liaison with North Somerset Council which is not part of the Combined Authority. The SDS was intended to provide a strategic plan for the WECA area and therefore, the framework for the three constituent authorities' local plans.
- 1.5 In May 2022 work on the WECA Spatial Development Strategy (SDS) was permanently halted<sup>2</sup>. Until that time the three Unitary Authorities had been engaging constructively and on an on-going basis with each other and WECA in the preparation of the SDS. By the time preparation was halted no draft versions of the SDS had emerged and so the authorities had not concluded any agreements on the detail of the cross boundary policies it would have contained.

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<sup>1</sup> Bath and North East Somerset, Bristol, North Somerset, South Gloucestershire.

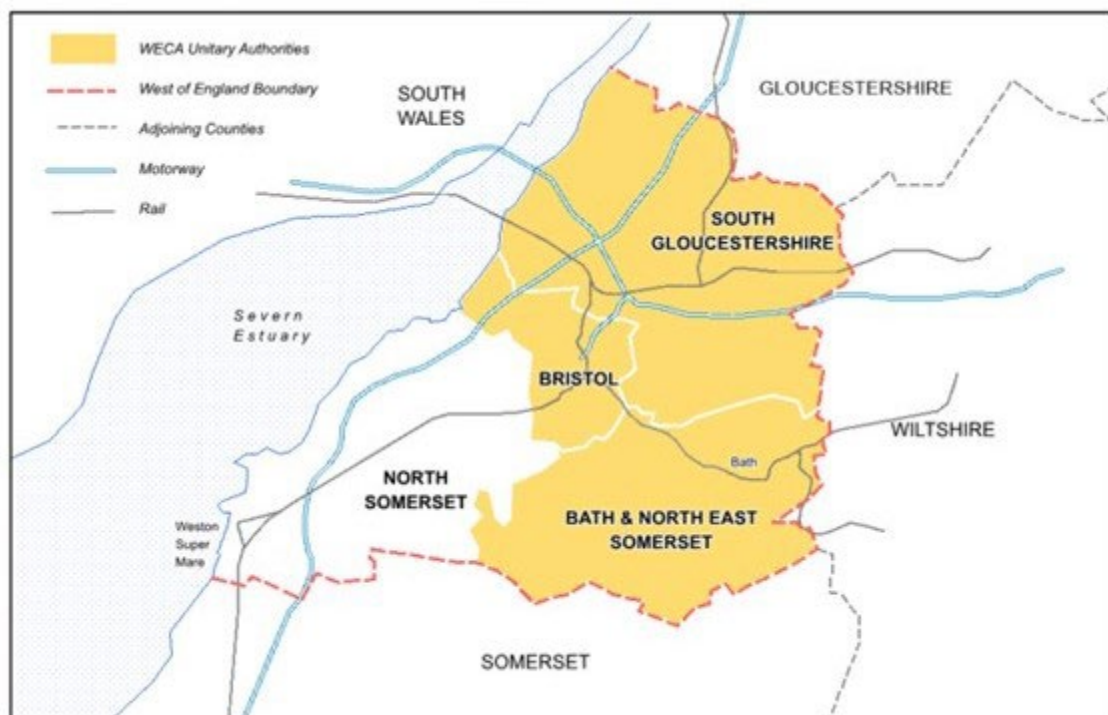
<sup>2</sup> *'Work on the Spatial Development Strategy (SDS) has been halted and is not being progressed by the West of England Combined Authority. Metro Mayor Dan Norris has written to the Department for Levelling Up, Housing and Communities to explain that he has asked officers to stop work as unanimous agreement on the plan by the councils has not been reached.'* Spatial Development Strategy - West of England Combined Authority (westofengland-ca.gov.uk)

- 1.6 Since the halting of work on the SDS the three UAs have confirmed they will:
- continue to co-operate and work with each other in preparing their respective Local Plans;
  - that the three Local Plans will provide the strategic planning policies in the WECA area; and
  - that the issue of housing need will now be addressed through the individual Local Plans.

## Strategic Geography

- 2.1 The geographical area to which this process of co-operation relates is the West of England Combined authority area as illustrated in the map below.

### West of England Combined Authority area (in yellow)



- 2.2 The West of England Combined Authority (WECA) area comprises the three unitary authority (UAs) areas of Bristol, Bath & North East Somerset, and South Gloucestershire. This area was established through the Devolution Deal signed with Government in 2017. The area is an appropriate geographical area for strategic cross-boundary planning which reflects existing strategic cooperation arrangements. The area also forms the majority of the identified housing market areas for Bristol and Bath, the functional economic market areas and the travel to work area of Bristol.

- 2.3 Cross-boundary matters also extend to include North Somerset, in a sub-region known as the West of England. North Somerset is functionally closely linked to the WECA area being part of the West of England functional economic market area and is also part of the Wider Bristol housing market area.

## Strategic Matters

- 3.1.1 This progress report and, in due course, the Statement of Common Ground is intended to document the actions taken to resolve strategic cross boundary issues through the duty to cooperate. Strategic matters are defined and set out under Section 3 Strategic Policies Paragraph 20 by the NPPF as including, but not limited to the following:

- (a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
- (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- (c) community facilities (such as health, education and cultural infrastructure); and*
- (d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

- 3.1.2 Strategic matters are also defined in the Planning and Compulsory Purchase Act 2004 Paragraph 4) a) as issues relating to the:

*‘Sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.’*

- 3.1.3 The NPPG paragraph 015 identifies examples of actions that advance the duty to cooperate, and which should be tailored to address local circumstances. Regarding strategic matters such actions can be seen as:

- working together at the outset of plan-making to identify cross-boundary matters which will need addressing;*
- producing or commissioning joint research and evidence to address cross-boundary matters;*
- assessing impacts of emerging policies; and preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated, (such as the distribution of unmet needs or policies relating to county matters).*

## **Key strategic matters relevant to the WECA Unitary Authorities**

- 3.1.4 Many of the strategic matters which were intended to be addressed through the WECA SDS must now be dealt with through the constituent UAs local plans. These include but are not limited to:
- (a) Assessment of, and responding to, housing need.
  - (b) Assessment of, and responding to, economic development requirements.
  - (c) Identification of strategic transport infrastructure and other infrastructure.
  - (d) Assessment of, and approach to, climate change mitigation and adaptation.
  - (e) Nature recovery.
  - (f) Health Inequality,
  - (g) Green Belt,
  - (h) Development Quality and
  - (i) Minerals
  - (j) Accommodation needs of Travellers

## **Strategic Planning Matters requiring cross boundary collaboration**

- 3.1.5 As explained above, the NPPF paragraph 20 sets out the key strategic matters that development plans must address. The three authorities consider the issues set out below relating to the area covered by the WECA UAs need cross boundary collaboration. Accordingly, the application of these considerations, the relevant geographical areas over which collaboration will, or is already occurring, and any joint evidence base scoping in response to this is set out below. This also incorporates and takes into account the climate and ecological emergencies that have been declared by the WECA UAs and by our adjoining local authorities. The identification of matters should not be taken to imply at this stage that there will be an individual policy on them in each authority's local plan; this will be determined in an evidenced led way through the preparation of those plans.

## **Assessment of and Responding to Housing Need**

- 3.1.5.1 The WECA area comprises two housing market areas, one based on Bristol that includes Bristol, South Gloucestershire and North Somerset, and the other based on Bath and includes most of Bath & North East Somerset. The nature particularly of the Bristol housing market area therefore makes housing capacity and distribution of growth, a strategic cross-boundary issue. This co-operation is particularly important in the WECA area because of the extent and focus of the two housing market areas.
- 3.1.5.2 Following the permanent halting of work on the Spatial Development Strategy it falls to Bristol City Council, Bath and North East Somerset Council and South Gloucestershire Council to determine housing need through their respective local plans having assessed available evidence. This work indicates an unmet housing

need for the City of Bristol that cannot be accommodated within the Bristol Local Plan area.

3.1.5.3 The authorities as at November 2023 have instructed expert consultants to undertake Local Housing Needs Assessment (LHNA) for their areas. A paper prepared for Bristol and published as part of a consultation on the Bristol Local Plan in November 2022 used an alternative approach to estimating housing need and a LHNA based on the government's standard method has also been produced. Accordingly, the UAs are exploring the potential to work together on the following:

- The extent to which any unmet needs arising in the City of Bristol can be met elsewhere.
- Sharing information about housing supply pipeline before establishing housing targets in emerging Local Plans.
- Considering the distribution of housing across the WECA area and the potential to respond to any unmet need arising in Bristol.
- As Local Plan preparation progresses to consider the response to unmet need and the resultant housing requirements for each Local Plan.

3.1.5.4 In October 2023 Bristol City Council wrote to the WECA authorities, and also to North Somerset, setting out its capacity to meet housing need (Appendix 1). The letter requested that the three authorities explore through their local plan processes whether they could accommodate a proportion of Bristol's unmet locally derived housing need as set out in detail in the letter. The authorities were requested to reply within the period during which the local plan was made available for representations.

## **Assessment and Delivery of Economic Development Requirements**

3.1.5.5 The West of England was defined through 2011 Census travel to work data as a Functional Economic Market Area (FEMA); data that has now been superseded through the 2021 census data. Changes in travel behaviour, have been seen due to the removal of the Severn Bridge tolls in 2018, and the Covid-19 pandemic from 2020 to 2022. However, the functional economic geography does not appear to have fundamentally changed.

3.1.5.6 Cross-boundary engagement on employment issues should therefore be centred on the West of England area (i.e. WECA area plus North Somerset). This progress report documents engagement on these issues across the WECA UAs. The focus of engagement relates to the strategic issues including forecasting of future economic growth; the protection of employment land and the relationship with housing capacity; the identification of additional supply of employment land to meet quantitative and qualitative needs; and transport serving employment areas including surface access to the port and airport as affects the WECA UAs. As such relevant collaboration has and will take place on evidence-base work; plan-making

and monitoring concerning economic recovery and growth; and distribution of employment-generating development.

- 3.1.5.7 The above work may include analysis and understanding of property markets (and to some extent supply chains and consumption patterns) that extend beyond the West of England FEMA.
- 3.1.5.8 In respect of evidence base work WECA and the four West of England UAs collaborated on an Employment Land Spatial Needs Assessment (ELSNA) in October 2021 that supported preparation of the then emerging SDS. The ELSNA focussed on quantitative and qualitative spatial needs, (relating to employment land, other employment-generating spaces, supporting infrastructure and interrelationships between them) and opportunities and constraints in how they might be responded to through spatial strategy and other development plan policy. The scope of the ELSNA considered [at a high level] the future spatial needs of retail, commercial, leisure and waste employment-generating businesses, as well as more traditional industrial uses and a variety of supporting infrastructure including digital, and the role(s) of the port and airport.
- 3.1.5.9 In preparing their respective Local Plan the UAs are reviewing the ELSNA and the extent to which updated evidence is needed, in part to assess and take account of changes in the economy since the Covid-19 pandemic and to also reflect local economic strategy priorities. Additional economic development needs assessments and supporting studies have been undertaken.

## **Transport and Other Infrastructure**

- 3.1.5.10 Transport networks of all types – road, rail, cycling and walking routes – extend across local authority boundaries, as do movements of people and vehicles. Key international connectivity serving the sub-regional economy is also provided for within this geographical area, notably via the Port and Airport which are in the Unitary Authority of North Somerset. Alongside these assets, digital connectivity is recognised as a complementary strategic network.
- 3.1.5.11 Managing the quality, connectivity and capacity of this infrastructure particularly in relation to growth including cumulative and cross boundary impacts, requires joint working, co-operation and liaison. As the Integrated Transport Authority, WECA is responsible for managing public transport on a cross-boundary basis, ensuring public transport is provided and planned for coherently across the area. The authorities, also have well-established joint working transport planning arrangements in place through the Joint Local Transport Plan process as demonstrated through ongoing work on JLTP5 and the City Region Sustainable Travel strategy (CRSTS) programme. Cross boundary engagement also takes place with other transport bodies (such as Highways England and Network Rail), including related to other workstreams such as through the Strategic Rail Programme Board. This engagement also informs Local Plan preparation.



3.1.5.12 To inform transport infrastructure investment and spatial planning that will influence travel demand and carbon emissions, a new transport model for the sub-region is being commissioned, alongside a transport appraisal framework for the WECA area that will draw on associated data as it is made available. This will enable the development and testing of a variety of infrastructure proposals and wider development scenarios to support local plan preparation.

## **Flood risk**

3.1.5.13 Flood risk along the Rivers Severn and Avon and their supporting tributaries, is the subject of cross-boundary co-ordination with support from the Environment Agency. The 3 Councils maintain their own flood risk assessments, working with the EA to ensure a consistent methodology and appropriate updates in light of new catchment modelling, climate change scenarios and so on. This work in recent years has resulted in a joint strategic flood risk management project at Severnside and will also contribute to the consistency of the SHLAAs/ HELAAs in the area. Cross boundary area-based studies will also explore new flood risk management investment options in combination with other infrastructure as required.

3.1.5.14 The WECA authorities will work with the utilities providers and waste authorities to establish existing capacity for growth. This will in some areas be part of cross-boundary area-based studies and infrastructure strategy work, as well as through more general existing engagement arrangements (centred on the West of England Strategic Planning Forum) which will help inform the SHLAA / HELAA impact assessment. A Renewable Energy Resource Assessment (RERAS) has been published across B&NES and SGlos to explore the most up to date position on renewable energy resources in the area and opportunities presented by this.

## **Social infrastructure provision and management**

3.1.5.15 Social infrastructure (including health, cultural and educational facilities) is of cross-boundary significance where its users come from an area that extends beyond the authority that the facility is based in, or where one or more areas face constraints to provision that are experienced differently in an adjoining area. Specialist hospitals and higher education facilities are most efficiently provided in the urban areas of Greater Bristol and Bath. This requires appropriate cross-boundary collaboration to manage the consequences of growth and to ensure that associated transport needs are addressed.

3.1.5.16 Health infrastructure need and management of capacity is managed through the partnerships referenced in the 'health inequalities' section above. Other social infrastructure needs/capacity requiring cross-boundary approaches will be explored as part the 3 Councils preparing their Local Plans and supporting Infrastructure Delivery Plans.

## Climate Change Mitigation and Adaptation

- 3.1.5.17 The WECA UAs have each declared a climate emergency. The aim being to take urgent steps to address this situation and prepare for the local impact of climate change and reducing carbon emissions. Each authority has set an aim of being carbon neutral by 2030.
- 3.1.5.18 Collaboration will take place on evidence gathering, plan-making (in so far as proposed policy approaches have cross boundary strategic impacts) and monitoring. In this regard a Renewable Energy Resource Assessment (RERAS) has already been undertaken across B&NES, South Glos and North Somerset to explore the most up to date position on renewable energy resources in the area, including technical constraints and opportunities.
- 3.1.5.19 Clean recovery and growth efforts are particularly focussed on reducing carbon emissions, due to each UAs climate emergency declaration and the aspiration to accelerate the shift to a 'Zero Carbon' way of life. However, air quality more generally also requires a cross boundary planning response due to the nature of transport and energy networks and movements that drive both carbon emissions and wider air pollution problems. This is reflected in objectives of the ~~recently~~ adopted Joint Local Transport Plan 4 (covering the whole of the West of England) and the commitment to an early review to reinforce this.

## Biodiversity, Nature Recovery and Green Infrastructure

- 3.1.5.20 The WECA area is bounded by natural cross-boundary features of international and national importance – the two limestone landscapes designated for their outstanding natural beauty - the Cotswolds AONB lies to the east and the Mendip Hills AONB to the south, with the Severn Estuary is an international wetland habitat. With a plethora of international and national sites of ecological importance these are recognised to form part of the cross-boundary 'Nature Recovery Network' of ecological connectivity, (or potential connectivity) that extends across the West of England and beyond. Given the proximity of these natural assets to major areas of population growth and other change which may have direct and indirect impacts on them, it is recognised that appropriate management, including an understanding of potential impacts of development and how they may act cumulatively or in-combination, will need to be co-ordinated across boundaries.
- 3.1.5.21 By preparing the West of England Joint Green Infrastructure Strategy, (JGIS) the authorities, together with key environmental partners, have agreed and established consistent evidence and guidance concerning the wider benefits of green infrastructure to inform policy development and the delivery and implementation of GI across a range of geographic scales. The JGIS sets out guidance which identifies approaches to ecosystem services and natural capital, potential for biodiversity net gains, and sensitivity of landscapes, ecology and the historical environment (as a

landscape scale). The West of England UAs have also progressed work on model GI policies that can be used, as appropriate, to inform each authority's Local Plans.

3.1.5.22 The future location of housing, population, jobs, and infrastructure will have a significant impact for both climate and nature growth as it generally increases carbon emissions and puts further pressure on the natural environment. By bringing forward our Local Plans the 3 Councils are taking the right steps to align our statutory planning policy frameworks to support the delivery of our Climate and Nature Emergency commitments and to give spatial expression to deliver the outcomes and principles as set within the JGIS.

3.1.5.23 Under the Environment Act, all planning applications granted, with a few exemptions, will have to deliver a minimum of 10% biodiversity net gain. In B&NES this requirement has been introduced through adoption in January 2023 of the Local Plan Partial Update and is being implemented now. We expect this to become mandatory nationally from November 2023 and will be measured using DEFRA's Biodiversity Metric with habitats created needing to be secured and monitored for at least 30 years. Through preparing our Local Plans we are putting in place the statutory practices and procedures that will ensure we are ready to secure 10% (or more) BNG from November 2023.

## Health inequality

3.1.5.24 Health inequality is identified as a cross-cutting spatial issue as many 'wider determinants of health' (such as active travel opportunity, air quality and access to green space) play out on a cross-boundary basis. Public health co-ordination and NHS strategic planning to improve health outcomes already occurs on a cross-boundary basis in the area. Two Sustainability and Transformation Partnerships (STPs) extend over local authority boundaries and include participation by the local authorities – one covering B&NES, Wiltshire and Swindon and the other Bristol, North Somerset and South Gloucestershire. These bodies provide a conduit for planners to engage with health bodies to ensure planning appropriately addresses such objectives.

## Green Belt

3.1.5.25 The Green Belt for Bristol and Bath urban areas extends across the boundaries of the WECA authorities (and beyond into North Somerset, Wiltshire and Somerset).

3.1.5.26 Any proposed amendments to Green Belt boundaries adjacent to neighbouring authority would have cross boundary implications to be addressed through cooperation. In its letter of 31 October 2023 (Appendix 1), Bristol City Council has referred to proposed changes to Green Belt within its area. These have been subject of earlier consultations and discussion.

## Development Quality

3.1.6 Development quality in terms of design and its execution is a key priority for each of the 3 Councils, particularly in relation to large scale housing developments, ensuring homes and infrastructure meet the needs of communities, as well as regional priorities such as tackling climate change, health inequalities and air quality. With many developers operating across the West of England, this presents a strategic opportunity to enhance design quality. This 'larger than local' approach to design quality is in line with the recommendations of the 'Building Better Building Beautiful Commission' and is already being applied through the 'Design West' design review service which operates across the West of England providing consistent access to advice.

## Minerals

3.1.7 Minerals reserves following landscape lines, and transport movements between source sites and areas of processing and use cross authority boundaries. The three Councils as Minerals Planning Authorities work together to produce a joint Local Aggregates Assessment enabling the sharing of specialist minerals planning resource and the maintenance of commercial confidentiality, which is important given the small number of operators active across the area. They also co-operate in and through the wider South West Aggregates Working Party structure. In doing so, they work together to assess needs, including for associated cross boundary transport infrastructure (e.g. railheads and ports), and plan for a steady and adequate supply through preparing their Local Plans, and these arrangements are intended to continue.

## Planning for Traveller sites

3.1.7.1 The approach to addressing the needs for accommodation for traveller is supported by evidence set out in gypsy and traveller and travelling show people accommodation assessments prepared by each authority. Having regard to the nomadic lifestyle of travellers, provision of accommodation can be a strategic cross boundary matter.

3.1.7.2 In October 2023, Bristol City Council advised the neighbouring authorities (Appendix 1) that needs for traveller sites are being considered through the emerging Bristol Local Plan based on an assessment undertaken in 2020. The level of need is relatively small in scale and the city council is expecting that to be accommodated within the city boundaries. It would nevertheless be helpful to continue to cooperate on this matter and share information on how these important needs are being addressed.

## **Summary of future co-operation**

3.1.7.3 To summarise, Bristol City Council continues to co-operate with the WECA authorities in relation to:

- Housing need including unmet need
- Economic development requirements
- Transport and other infrastructure
- Response to flood risk
- Social infrastructure provision
- Climate change mitigation
- Biodiversity, nature recovery and green infrastructure
- Health inequality
- Green Belt
- Development quality
- Minerals
- Planning for traveller sites

# Appendix 1

Letter from Bristol City Council to Bath and North East Somerset Council, South Gloucestershire Council and North Somerset Council - 31 October 2023

## BRISTOL LOCAL PLAN – REGULATION 19 - DUTY TO COOPERATE

1. As mentioned in various informal co-operation meetings Bristol City Council is intending to progress with taking the Bristol Local Plan to the publication stage in November 2023. This letter seeks to formally outline our requests to consider matters under the duty to cooperate as they relate to strategic matters and in particular the approach to housing need.
2. Our authorities have been cooperating for many years with the ambition of setting a strategic framework upon which our new local plans will be based. In November 2017 we published a joint strategy (West of England Joint Spatial Plan) which represented our agreement to address development needs across our areas. Whilst the Joint Spatial Plan was withdrawn, the process of cooperation continued into the preparation for a Spatial Development Strategy (SDS) for the West of England Combined Authority, a process which also saw continued liaison with North Somerset Council. Following the halting of the SDS process in May 2022<sup>3</sup> we have continued to cooperate on cross boundary matters including our approach to commissioning cross boundary evidence.
3. As part of this we wrote to you in November 2022 setting out Bristol City Council's approach to the duty to cooperate. This included the first iteration of a Statement of Common Ground (developed jointly with Bath and North East Somerset Council and South Gloucestershire Council). The SoCG identified the key strategic matters for the WECA area.

### Bristol's housing need

4. We have all consistently agreed that strategic housing issues are matters which we should consider in cooperation, acknowledging the particular emphasis given to this in government policy and guidance and in the approach taken to local plan examinations.
5. The Government's standard method forms the starting point for determining housing need in Bristol. The 2023 standard method figure for Bristol comprises two elements:
  - A locally derived need of **2,503** homes per annum, based on 2014-based population projections, with an additional allowance for inward migration and historic undersupply.
  - An additional 35% cities and urban centres uplift, resulting in a total figure of

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<sup>3</sup> 'Work on the Spatial Development Strategy (SDS) has been halted and is not being progressed by the West of England Combined Authority. Metro Mayor Dan Norris has written to the Department for Levelling Up, Housing and Communities to explain that he has asked officers to stop work as unanimous agreement on the plan by the councils has not been reached.' [Spatial Development Strategy - West of England Combined Authority \(westofengland-ca.gov.uk\)](https://www.westofengland-ca.gov.uk/spatial-development-strategy-west-of-england-combined-authority)

**3,380** homes per annum. Applicable to the 20 largest cities and urban centres in England, the 35% uplift (which amounts to an additional 877 homes per annum) represents a contribution to national housing targets above and beyond the new homes that are needed locally.

6. As you are aware, the November 2022 consultation on the Bristol Local Plan was accompanied by an assessment of local housing needed which suggested a locally derived need of approximately 2,600 homes per annum for Bristol, based on 2018-based population projections, with an additional allowance for inward migration and historic undersupply (Local Housing Need in Bristol – ORS 2022).

7. The need identified in the November 2022 report is of a scale that is comparable with the locally derived element of the Government's standard method figure as an expression of the local housing need for Bristol. As such, Bristol's latest draft LHNA report (City of Bristol Local Housing Needs Assessment: Report of Findings – ORS 2023) uses the locally derived element of the standard method figure as the principal basis for its in-depth assessment of Bristol's housing needs. A later chapter of the draft LHNA report explores the implications of adding the nationally derived element represented by the cities and urban centres uplift.

### ***Bristol's proposed housing requirement***

8. The city council considers that the best place to meet the housing needs of Bristol is within the city – as far as this is possible given the city's capacity to sustainably accommodate new development within its boundaries. We therefore seek to meet as much as reasonably possible of the housing need within our local authority boundary.

9. As set out in our local plan consultation of November 2022, the council is proposing a housing requirement for Bristol of 1,925 homes per annum (i.e. 34,650 homes over the plan period to 2040). This is a deliverable capacity led figure which assumes development at optimised urban densities (consistent with emerging plan policies for urban living and experience of numerous redevelopment schemes over recent years). It is based on maximising opportunities for making efficient use of urban land and the release of some sites from the Green Belt within Bristol for residential and mixed-use development. This annual housing requirement figure would represent the highest for any plan for Bristol in decades and represents a 15% increase over what had been agreed for the withdrawn Joint Spatial Plan November 2017 (1,675 per annum).

10. The City Council has undertaken extensive work to establish the anticipated capacity of housing land within the plan area. This has built upon previous work to support the withdrawn Joint Spatial Plan and the halted Spatial Development Strategy. It is based on a variety of sources including our published Urban Potential Assessment, masterplanning exercises and work undertaken to support the preparation of development frameworks for regeneration areas. It also includes information on past trends, windfall allowances and historic rates of delivery. The regeneration of areas such as St Philip's Marsh, enabled by new flood defence infrastructure, as proposed in the emerging local plan will make a substantial contribution to meeting this ambitious requirement figure.

11. Even with this sizeable and ambitious housing requirement there remains a gap between what can be delivered in the city in the plan period and likely need. The scale of the unmet need depends on the extent to which the standard method and its cities and urban centres uplift is considered to realistically represent objectively assessed need.

	Standard method Locally derived element	Standard method With urban uplift
Homes per annum (total by 2040)	2,503 (45,054)	3,380 (60,840)
Proposed housing requirement (total by 2040)	1,925 (34,650)	1,925 (34,650)
Unmet (total by 2040)	578 (10,404)	1,455 (26,190)

### ***Identifying the extent of unmet need***

12. The Government’s national planning practice guidance (Housing and Economic Needs Assessment) states that the urban uplift is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations<sup>4</sup>. The recent consultation on proposed changes to the National Planning Policy Framework has further indicated that the government does not intend that urban uplifts are to be met in surrounding areas.

13. The standard method uses a formula to identify the minimum number of homes expected to be planned for in Bristol. Incorporating the cities and urban centres uplift, the formula indicates a gap of around 26,000 homes it seems unlikely that could be accommodated in surrounding areas. Bristol is demonstrably unable to meet all of the locally derived element of housing need within its administrative boundaries. If the cities and urban centres uplift is added to unmet locally derived housing need, the uplift would, of necessity, fall entirely to surrounding authorities to be met, contrary to the spirit of the national planning practice guidance.

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<sup>4</sup> “This increase in the number of homes to be delivered in urban areas is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations. In considering how need is met in the first instance, brownfield and other under-utilised urban sites should be prioritised and on these sites density should be optimised to promote the most efficient use of land. This is to ensure that homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the service they rely on, making travel patterns more sustainable.” (Paragraph: 035 Reference ID: 2a-035-20201216)



### ***Potential contribution to address unmet need arising***

14. Having regard to the matters set out above, for the purposes of the duty to cooperate, Bristol is focusing its consideration of unmet need on the critical **locally derived** element of that need, comprising as a minimum:

<b>578</b> homes per annum	<b>10,404</b> homes over plan period of 2022-2040
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15. Taking the above housing-related matters into account, the city council requests that [authority name] explores through its local plan process whether it could accommodate a proportion of Bristol's unmet locally derived housing need as set out above. A similar request is being made to [authority name] and [authority name].

16. The city council recognises that each neighbouring authority's first responsibility is to meet its own local housing needs and that any contribution to meeting Bristol's unmet need is an additional ask on top of this. Accommodating a proportion of Bristol's unmet locally derived need will depend on each authority's potential to be able to identify suitable additional land and the impact this would have in terms of national planning policy and strategic infrastructure.

### ***Needs for specific forms of residential accommodation***

17. Traveller sites - The needs for traveller sites are being considered through the emerging Bristol Local Plan based on an assessment undertaken in 2020. The level of need is relatively small in scale and the city council is expecting that to be accommodated within the city boundaries. It would nevertheless be helpful to continue to cooperate on this matter and share information on how these important needs are being addressed.

18. Student accommodation – our authorities each contain or adjoin large higher education campuses. The emerging Bristol Local Plan proposes to make provision for at least an additional 9,000 student bedspaces building on the existing supply and extant permissions. It is considered that this provision will address the needs arising from the growth of the University of Bristol in particular. The city council considers these needs can be met within Bristol and no unmet need has been identified separate to the housing matters discussed above.

### **Employment Land Need and Supply**

19. The emerging local plan for Bristol sets out a strategy for the city's economy which, in summary, focuses the growth of higher intensity workspace in Bristol City Centre including Bristol Temple Quarter and St Philip's Marsh, identified areas of regeneration and the city's town, district and local centres. The substantial industrial, distribution and port/port related industrial area at Avonmouth is the core focus for industrial regeneration and new development allocations there support further expansion. The area adjoins Severnside in South Gloucestershire forming the Avonmouth Severnside Enterprise Area which is recognised in the emerging local plan as a key strategic employment location in the West of England. In other parts of the city industry and distribution areas have been identified for the continued use and regeneration of industrial and warehousing premises.

20. The city council considers that the strategy set out in the emerging plan appropriately addresses the needs for commercial development in Bristol over the plan period and needs which would need to be met elsewhere have not been identified. As further evidence is prepared your authority will be considering further the approaches to economic development through local plan preparation. The city council will be pleased to engage with you in those processes.

### **Strategic Infrastructure**

21. Strategic infrastructure matters are relevant strategic matters for consideration under the duty to cooperate. This includes matters such as road networks, mass transit and other public transport, active travel modes, education, recreation and open space, community facilities and service provision. The Publication Bristol Local Plan will be supported by an Infrastructure Delivery Plan. We enclose a draft with this letter.

...

23. We would welcome any comments on the IDP and further reflections on cross boundary infrastructure matters which may be relevant to the on-going preparation of our local plans.

### **Conclusions**

24. As set out above, the city council requests that [authority name] explores through its local plan process whether it could accommodate a proportion of Bristol's unmet locally derived housing need. The city council will also be pleased to engage in any further discussions in relation to economic development and cross-boundary infrastructure matters.

25. The city council would welcome [authority name]'s response to this letter within the representations period for the Bristol Local Plan publication stage, incorporating or referencing as appropriate [authority name]'s representation on the plan itself.

26. The city council will also continue to liaise with [authority name] in the preparation of a Statement of Common Ground, to be made available when the Bristol Local Plan is published. Consistent with national Planning Practice Guidance<sup>5</sup>, the statement will set out any agreement that has been achieved on strategic matters, along with outstanding matters which still need to be addressed and the process for reaching agreements on these. The statement will be updated periodically to ensure that it reflects the most up to date position in terms of joint working across the area.

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<sup>5</sup> 'Plan-Making', Paragraph: 020 Reference ID: 61-020-20190315