

West of England Combined Authority Area
Unitary Authorities:

Bristol City, Bath & North East Somerset
and South Gloucestershire Councils

Planning for strategic cross boundary matters

Statement of Common Ground at April 2024

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Introduction and Background

- 1.1 This statement of common ground is prepared by the authorities of Bristol City Council, Bath and North East Somerset Council and South Gloucestershire Council in relation to areas of liaison and co-operation between them on strategic matters that cross the boundary between the authorities as relates to the preparation of their respective local plans.
- 1.2 This statement (SoCG) between the three authorities has been prepared because the West of England Combined Authority (WECA) and the three constituent authorities of Bath and North East Somerset (B&NES), Bristol City (BCC) and South Gloucestershire (SGC) following the halting of the SDS in May 2022, as explained below, need to progress their individual local plans, addressing both strategic and local matters. Therefore, this statement relates to those strategic, cross boundary matters relevant to the WECA area that will be addressed through the local plans.
- 1.3 In addition to this statement each authority will prepare and publish bilateral statements, where appropriate ahead of their respective local plan examinations, relating to cross boundary strategic matters between neighbouring authorities.

Statement at January 2024

- 1.4 This statement of common ground has been prepared at this time in order to outline the strategic matters on which co-operation has taken place, the key outputs from this co-operation, and any areas where agreement has been reached, or has not been reached, in addressing these matters. The statement is a 'living document' 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.

Content of the statement of common ground

- 1.5 The National Planning Policy Framework 2023 (NPPF) paragraphs 24-27 provide guidance on maintaining effective collaboration between Local Planning Authorities (LPAs). It states:

24. Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected

Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).

26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

27. In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.

- 1.6 The National Planning Practice Guidance (the NPPG) on plan-making (paragraph 010) describes a statement of common ground as:

Written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate.

- 1.7 The planning practice guidance¹ explains that a statement is expected to contain the following:

a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);

b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;

c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);

¹ Plan-making Paragraph: 011 Reference ID: 61-011-20190315

d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;

e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;

f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;

g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and

h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.

- 1.8 The purpose of the SoCG is not to provide a comprehensive record of every instance of cooperation and consultation undertaken both jointly between the three authorities and through bilateral working arrangements, during the preparation of each authority's new local plan. It is rather a means of providing key information as to how cooperation has been approached, regarding what issues, and how effectively.

History of strategic cooperation

- 1.9 The authorities have been cooperating for many years with the ambition of setting a strategic framework upon which our new local plans will be based.
- 1.10 In 2020 the West of England Combined Authority and its constituent authorities (Bath & North East Somerset, Bristol and South Gloucestershire Councils) agreed to commence work on a Spatial Development Strategy (SDS) for the region, along with a supporting strategic evidence base. The intention of the SDS was to provide a strategic plan that would set out a spatial framework for new homes, transport links, employment and green space.
- 1.11 In May 2022 work on the SDS was halted by the West of England Metro Mayor, as unanimous agreement on the plan could not be reached by all participating Councils. In the absence of an SDS, the Combined Authority has recognised the need for its constituent authorities to develop their individual local plans to address both strategic and local planning issues. Accordingly, WECA remains committed to working in partnership with its constituent authorities to ensure responding to the region's housing, employment, infrastructure, climate emergency and nature recovery needs are coordinated and considered to complement and enhance the

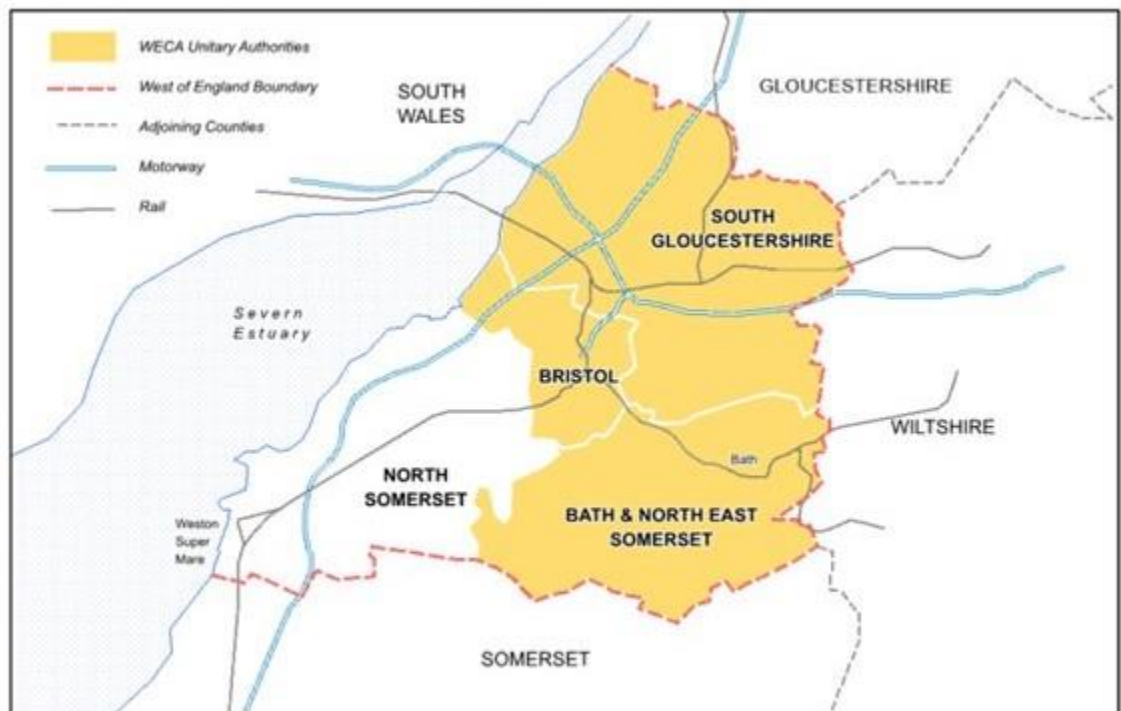
progress made through and to support the timely progress of the UAs local plans. Since the halting of work on the SDS the three local authorities have confirmed:

- 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
- the issue of housing need will now be addressed through the individual local plans within the context of the duty to cooperate.

Strategic Geography

- 2.1 The geographical area to which this statement relates is the West of England Combined Authority area as illustrated in the map below.

Area covered by this statement (in yellow)



- 2.2 The Combined Authority area comprises the three unitary authority 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 covered by the statement is an appropriate geographical area which reflects existing strategic cooperation arrangements. The area also forms the majority of the identified housing market areas for Wider 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. North Somerset will document engagement on strategic matters through preparing statements of common grounds with key stakeholders relating to their own local plan. Additionally, the three signatory UAs to this statement will also continue to engage with North Somerset Council regarding strategic, cross boundary issues relating to their respective Local Plans. As such this statement relates to strategic cross boundary matters within and between the area covered by the WECA UAs.

Strategic Matters

3.1 The SoCG 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.

3.2 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.’

3.3 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

- 3.4 Many of the strategic matters which were intended to be addressed through the WECA SDS must now be dealt with through the constituent UA's 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.
 - (i) Minerals.
 - (j) Accommodation needs of Travellers.

Strategic planning matters requiring cross boundary collaboration

- 3.5 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, which may also involve the Combined Authority, 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

- 3.6 The WECA area contains two housing market areas, one centred on Bristol, the other on Bath. The cross-boundary nature of the Bristol housing market area in particular makes housing capacity and distribution of growth, a strategic cross-boundary issue.
- 3.7 Following the 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 their strategic housing requirements through their respective local plans.

- 3.8 The authorities have instructed an expert consultancy to undertake Local Housing Needs Assessment (LHNA) for their areas. A paper prepared for Bristol and published as part of the Regulation 18 Bristol Local Plan consultation (November 2022) explored an alternative approach to estimating housing need and a LHNA based on the government's standard method has also been produced.
- 3.9 On 31st 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 consider this approach within the period during which the Bristol Local Plan was made available for representations.
- 3.10 So far Bath and North East Somerset's and South Gloucestershire's emerging local plans have focused on meeting their districts' housing needs. Through the preparation of their respective local plans it is agreed that Bath and North East Somerset and South Gloucestershire will consider their approach to responding to the BCC unmet housing need request. The proposed response of both authorities will be set out in their respective draft local plans (Publication Versions) to be consulted upon under Regulation 19.

Assessment and delivery of economic development requirements

- 3.11 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 or 2020 to 2022. However, the functional economic geography does not appear to have fundamentally changed.
- 3.12 Cross-boundary engagement on employment issues should therefore be centred on the West of England area (i.e. WECA area plus North Somerset). This statement 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. In undertaking this work, the Combined Authority has also co-commissioned the updating of sub-regional analysis on economic forecasts. 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.
- 3.13 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. 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.

- 3.14 In preparing their respective local plan the UAs have reviewed 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, for their respective local plans.

Avonmouth Severnside Enterprise Area

- 3.15 Bristol Port (which is located in Bristol and North Somerset) has a significant role in the local economy and national economy. It is situated within the wider Avonmouth Severnside Enterprise Area which covers 1,800 hectares extending five miles along the Severn Estuary within South Gloucestershire and Bristol. It is described a globally-significant accessible business location [Avonmouth Severnside - Invest Bristol and Bath](#). The area has been subject of complementary planning policies in the current local plans for the two authorities. This is expected to continue in the emerging local plans for both South Gloucestershire and Bristol.

Employment

It is a matter of agreement that the WECA authorities with the support of WECA are working collaboratively on developing their employment spatial needs evidence base covering the WECA area, with clean, sustainable and inclusive post-Covid 19 recovery and prosperity and fairness at its heart. Evidence base co-commissioning work will have a scope as relevant to the individual local plans being prepared and will cover the needs of the office, industry and warehousing sectors and the role and potential future roles of infrastructure (including digital networks, the port and airport) in the functioning of the economy.

Transport and other infrastructure

- 3.16 The National Planning Policy Framework paragraphs 108 to 109, requires transport issues to be considered from the earliest stages of plan-making. It states that the planning system should actively manage patterns of growth to realise opportunities from existing and proposed transport infrastructure, to promote walking, cycling and public transport and to address impacts on transport networks and the environmental impacts of traffic and transport infrastructure.
- 3.17 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 the wider geographical area, notably via Bristol Port and Bristol Airport. Alongside these assets, digital connectivity is recognised as a complementary strategic network.

- 3.18 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 Transport Settlements (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.
- 3.19 To inform transport infrastructure investment and spatial planning that will influence travel demand and carbon emissions, the West of England Regional Transport Model (WERTM), has been developed in line with the DfT's Transport Analysis Guidance and is being used by the constituent authorities as the basis to inform the development of their local plans, 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. It is important to ensure that collectively we have a clear understanding of the transport impact and necessary interventions to support development proposed in local plans (both individually and cumulatively).

Transport

It is a matter of agreement that the WECA authorities recognise the value in co-ordinating transport and spatial planning across their area. In order to best manage growth and cross cutting priorities for change (including addressing the Climate Emergency) this involves consideration of a wide range of movement and connectivity including complementary digital networks. The new West of England Regional Transport Model and associated WECA area appraisal framework will be an important basis for this work, as well as other more focussed cross-boundary and inter-authority access and movement studies. In summary, the parties agree that BCC, in preparing the Bristol Local Plan has engaged proactively and positively with Bath and North East Somerset Council, South Gloucestershire Council and WECA on strategic transport matters through the Duty to Cooperate.

Flood risk

- 3.20 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 three local authorities 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 joint strategic flood risk management projects at Severnside and for the River Avon 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.

Waste, utilities and energy

- 3.21 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, where appropriate, as well as through more general existing engagement arrangements. Through this work the appropriateness of the strategy and capacity for dealing with the various waste streams as set out in the JWCS for each authority will be reviewed. The outcomes of this review for each authority will be set out in the authorities' respective LDS and/or Local Plan. A Renewable Energy Resource Assessment (RERAS) has been published across B&NES and South Gloucestershire 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

- 3.22 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.
- 3.23 Health infrastructure need and management of capacity is managed through the partnerships referenced in the 'health inequalities' section below. Other social infrastructure needs/capacity requiring cross-boundary approaches will be explored as part the three local authorities preparing their local plans and supporting Infrastructure Delivery Plans.

Managing flood risk, utilities and social infrastructure

It is a matter of agreement that the WECA authorities recognise the importance of working together and with other infrastructure providers and commissioners to ensure infrastructure serving cross-boundary needs is able to accommodate growth and best support other cross-cutting priorities for change. This will involve multi-disciplinary working at a variety of scales to investigate opportunities and options and will be detailed and identified through preparing the Councils Infrastructure Delivery Plans.

Climate change mitigation and adaptation

- 3.24 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.
- 3.25 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.
- 3.26 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 adopted Joint Local Transport Plan 4 (covering the whole of the West of England) and the commitment to an early review to reinforce this.

Climate Change Mitigation and Adaptation

It is a matter of agreement that the WECA authorities recognise the value in working together including through plan-making to contribute to tackling carbon emissions and air quality due to cross boundary movement, networks and other cross-boundary activity affecting emissions.

Biodiversity, nature recovery and green infrastructure

- 3.27 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 lies to the east and the Mendip Hills to the south, with the Severn Estuary 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.
- 3.28 By preparing the West of England Joint Green Infrastructure Strategy, (JGIS) co-ordinated by WECA, 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 evidences the need and use of natural solutions to address challenges including the climate emergency and declining biodiversity. 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.

- 3.29 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 three local authorities 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.
- 3.30 Under the Environment Act, all planning applications granted, with a few exemptions, will have to deliver a minimum of 10% biodiversity net gain, (BNG). 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 January 2024 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.
- 3.31 Work is also underway led by the Combined Authority on behalf of the West of England Combined Authority Mayor, as the Responsible Authority appointed by DEFRA, to prepare the Local Nature Recovery Strategy (LNRS) to coordinate efforts to restore nature across the region. This will help LPAs ensure that areas of greatest potential for nature recovery can be better reflected in planning decisions and supports plan-makers to address the National Planning Policy Framework requirement for plans to protect and enhance biodiversity. The West of England Combined Authority aim is to have the LNRS in place by June 2024 so local plans can 'take account' of LNRS as required by the Levelling Up and Regeneration Act 2023.

Ecological Emergency and Nature Recovery

It is a matter of agreement that the WECA authorities, as set out in the Joint Green Infrastructure Strategy (JGIS), recognise the essential role that multifunctional GI plays in delivering resilient, healthy, well planned places as part of broader cross-boundary infrastructure planning and place-making work. Accordingly, we have agreed to continue to work in partnership on the delivery of the JGIS Action Plan, and review and add to JGIS evidence and content in order to continue to support its consistent application in plan making, particularly in light of the Environment Bill.

Accordingly, the WECA authorities acknowledge a need to work across boundaries to consistently assess and manage direct and indirect development impacts (including opportunities for enhancement) on natural and historic environmental assets, including building a resilient and robust Nature Recovery Network and to work together to ensure our local plans delivery of mandatory BNG from January 2024.

Health inequality

- 3.32 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.

Health Inequality

It is a matter of agreement that the WECA authorities recognise the value in working together through plan making to contribute to tackling health inequalities due to wider determinants of health being influenced at this spatial level.

Green Belt

- 3.33 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).
- 3.34 Any proposed amendments to Green Belt boundaries adjacent to a 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. The proposed changes to Green Belt within the Bristol City Council area include land at Brislington. Bristol City Council and Bath and North East Somerset Council will continue to engage on the consideration of potential for development across the administrative boundary in the Brislington and Hicks Gate area which would require changes to the Green Belt within Bath and North East Somerset. Any changes to the Green Belt within Bath and North East Somerset will be established through its Local Plan.

Green Belt

It is a matter of agreement that the WECA authorities will take a cooperative approach regarding any proposals to amend the extent of the Green Belt where those proposals would have implications across local authority boundaries.

Development quality

- 3.35 Development quality in terms of design and its execution is a key priority for each of the three local authorities, 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. The authorities are partners in the West of England Placemaking Charter. The Placemaking Charter sets out a shared vision and set of principles to guide development and regeneration that will bring health, happiness and quality of life into the heart of towns, cities and rural communities, shaping places that are future ready, connected, biodiverse, characterful, healthy and inclusive.

Development Quality

It is a matter of agreement that the WECA authorities by engaging through the Design West Review Panel and in sharing experience and expertise in preparing design policies for their respective local plans recognise the value in working together to improve the quality of development, set high aspirations for place shaping and provide a consistent approach to engaging with developers to ensure new development contributes to achieving sustainable and inclusive communities, as well as local distinctiveness.

Minerals

- 3.36 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.

Minerals

It is a matter of agreement that the West of England Minerals Planning Authorities will continue to work together in producing their Local Aggregates Assessment, and to co-operate in and through the SW Aggregates Working Party in line with national policy and guidance.

Planning for traveller sites

- 3.37 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.
- 3.38 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 areas of agreement and future co-operation

- 3.39 The following outline the cross boundary areas of co-operation on the listed strategic issues and briefly summarise the main areas of agreement reached to date from co-operation and areas where further work/co-operation is needed i.e., agreed next steps. This may also need to reference how issues raised in each authorities comments on the respective local plans are being addressed (if relevant across the whole WECA area):

- 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

Signatories

The statement above represents the agreement of the three authorities on the strategic matters to be addressed and describes the processes of cooperation to date. When specific agreements are reached on matters of strategic policy each authority will confirm those agreements by signing an updated version of this statement.

Date of this version: April 2024

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 2022² 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 **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

² '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)

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 obligations³. 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.

Potential contribution to address unmet need arising

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

578 homes per annum	10,404 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.

³ "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)

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 Guidance⁴, 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.

⁴ 'Plan-Making', Paragraph: 020 Reference ID: 61-020-20190315