



Bristol Local Plan Examination

Topic paper

Maintaining effective cooperation

November 2024



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Maintaining effective cooperation

1. This topic paper sets out how the Bristol Local Plan has been prepared in accordance with the duty to co-operate required by the Planning and Compulsory Purchase Act 2004 (as amended) and in accordance with the guidance in the National Planning Policy Framework.
2. This paper will be added to the examination library.

Legislative and policy context

Localism Act 2011

3. In response to its abolition (Section 109) of the then strategic layer of planning contained in regional strategies, the Localism Act 2011 inserted an amendment into planning legislation that attempted to establish a new process of planning across local authority boundaries (Section 110). This was legislated for as a *duty to cooperate* which was inserted into the 2004 planning act. The duty has been in place during the time the new Bristol Local Plan has been in preparation.

Levelling Up and Regeneration Act 2023

4. The Levelling Up and Regeneration Act 2023 will revoke the duty to cooperate (Section 97). Meanwhile, it remains in legislation under the current local plans system.

Proposed reforms to the National Planning Policy Framework and other changes to the planning system July 2024

5. In its July 2024 paper on planning reforms, the government has indicated that is proposing to introduce '*effective new mechanisms*' for cross-boundary strategic planning including short term measures which will strengthen cross-boundary co-operation, ahead of introducing formal strategic planning mechanisms through new legislation. The government has stated that it is its intention to move to a model of universal strategic planning covering functional economic areas within the next five years.

6. Meanwhile, the government has proposed amending the 'maintaining effective co-operation' section of the NPPF to ensure that '*the right engagement is occurring*' on the sharing of unmet housing need and other strategic issues where plans are being progressed.

Planning and Compulsory Purchase Act 2004

7. Section 33A of the Planning and Compulsory Purchase Act 2004 therefore continues to set out a duty on local planning authorities and a number of public bodies to co-operate on the preparation of development plan documents '*so far as relating to a strategic matter*'.

8. Section 33A also indicates that a person subject to the duty must have regard to any guidance given by the Secretary of State about how the duty is to be complied with. That advice is currently set out in the National Planning Policy Framework and in national planning practice guidance, in particular 'Plan-making'.

9. A 'strategic matter' is defined by the Act as:

'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’.

10. The bodies prescribed for the purposes of section 33A(1)(c) of the Planning and Compulsory Purchase Act are:

- the Environment Agency;
- the Historic Buildings and Monuments Commission for England (*Historic England*);
- Natural England;
- the Mayor of London;
- the Civil Aviation Authority;
- the Homes and Communities Agency (*Homes England*);
- each integrated care board established under Chapter A3 of Part 2 of the National Health Service Act 2006;
- NHS England
- the Office of Road and Rail;
- Transport for London;
- each Integrated Transport Authority;
- each highway authority within the meaning of section 1 of the Highways Act 1980;
- the Marine Management Organisation

11. The Act also refers to other bodies which are not subject of the duty but with which the other prescribed bodies must cooperate (National Planning Practice Guidance paragraph 030 refers):

- each local enterprise partnership; and
- each local nature partnership.

12. The council has not engaged with the Mayor of London or Transport for London given the lack of geographical or operational connections. Where generic names for bodies are stated, the council has engaged with the following:

- Integrated care board = NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board
- Local enterprise partnership = West of England Local Enterprise Partnership
- Local nature partnership = West of England Local Nature Partnership

Marine Management Organisation - Marine Plans

13. There is an expectation that in coastal areas planning policies and decisions should take account of the UK Marine Policy Statement and marine plans (NPPF paragraph 170). The council has complied with this by having regard to the South West Inshore and South West Offshore Marine Plan June 2021. The Marine Management Organisation has been consulted and has not made any representations regarding any matters relating to the new local plan’s relationship with the marine plan, or regarding duty to cooperate matters.

National Planning Policy Framework

14. The National Planning Policy Framework (September 2023) confirms in its section on ‘Maintaining Effective Cooperation’ that:

“Local planning authorities ... are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries” (paragraph 24)

15. The NPPF then goes on to say:

‘Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.’

16. It then adds:

‘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)’ (paragraph 25)

‘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.’ (paragraph 26)

‘In order to demonstrate effective and on-going joint working, strategic policy-making 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.’ (paragraph 27)

17. Having regard to the NPPF, this paper provides and signposts information to confirm that:

1. The duty to cooperate has been complied with;
2. Collaboration has taken place to identify the relevant strategic matters which the Bristol Local Plan needs to address;
3. That the council has also engaged with the local community and relevant bodies;
4. Needs which cannot be met wholly within the plan area and infrastructure matters have been addressed through the cooperation process;
5. Statements of common ground were prepared and maintained.

The following sections consider the response to each of these strands of national planning policy in turn.

1. Compliance with the duty

18. As discussed in the previous section, the current duty to cooperate is now obsolescent and has evidently been considered by government as ineffective given the intention to introduce effective new measures as discussed in the 30 July 2024 paper on proposed reforms to national planning policy and other changes to the planning system. The Levelling Up and Regeneration Act will revoke the duty and the government plans instead to enable

through legislation universal coverage of strategic planning within the current Parliament. This model is understood to involve Spatial Development Strategies for Mayoral areas and spatial strategy arrangements are being explored for those areas outside Mayoral areas.

19. Whilst the context has been subject of changes and the duty is now obsolescent, Bristol City Council has complied with Section 33A during the period of preparation of the local plan review process constructively, actively and on an ongoing basis as demonstrated in this paper. This compliance is reflected within the new local plan and the on-going processes of cooperation. This section will highlight the mechanisms and outcomes of compliance with the duty, with later sections and the appendices providing additional detail.

Process of maintaining effective cooperation

20. As referred to in the Joint Statement of Common ground (PAL006) and the council's response to the inspectors' preliminary questions, the process of cooperation on strategic matters regarding the Bristol Local Plan can be considered to have spanned the preparation of the withdrawn Joint Spatial Plan Published November 2017 (to which PCD001 and PCD002 refer) and the halted Spatial Development Strategy through to the positions set out in the statements of common ground between the relevant authorities. As indicated in the statements of common ground, the processes of cooperation or joint working continued including through the commissioning and consideration of joint evidence as each authority moved forward to complete local plans without a strategic level plan in place. The Bristol Local Plan (November 2023) is the first local plan in the West of England sub-region to be submitted within that strategic planning context.

Joint Spatial Plan November 2017

21. The current local plan for Bristol (Core Strategy 2011 and the two polices/sites plans) has a plan period of 2006 to 2026 with a stated review date of 2016. The preparation of the West of England Joint Spatial Plan which started in 2014 was the first part of the review of Bristol's local plan because it was the mechanism for addressing the key strategic matters such as the distribution of housing.

22. When the submitted Bristol Local Plan was in its earlier stages of preparation it was expected that it would be in conformity with a joint plan for the West of England. The Joint Spatial Plan was to have covered the period 2016 to 2036.

23. The Joint Spatial Plan was to be the vehicle for addressing strategic matters and was considered part of the participating authorities' ongoing compliance with the duty to cooperate. Its commencement pre-dated the West of England Combined Authority but the document was referred to in the West of England Devolution Agreement which states:

'The Joint Spatial Plan will provide the higher level strategic planning policy framework for each Unitary Authority's local plan reviews. All planning authorities in the West of England commit to bringing forward up to date Local Plans in line with this overall strategic framework.'

The Secretary of State for Communities and Local Government will acknowledge the weight of the West of England Joint Strategic Plan and the four respective local plans as the basis of a comprehensive plan-led approach. The Secretary of State for Communities and Local

Government will assist, where possible, in streamlining planning processes so that once the Joint Strategic Plan is in place Local Plans can be rapidly adopted.'

24. The submitted Joint Spatial Plan was agreed as a development plan document by each of the four authorities and was published in November 2017. It represented their agreed planning strategy for the joint area addressing matters of housing requirement for each authority, the spatial strategy for the plan area as a whole, affordable housing targets, the employment land requirement, place shaping principles, strategic infrastructure requirements and strategic development locations across the plan area. The agreed housing distribution from that withdrawn plan is shown in the table below for information:

	Annual housing requirement 2016 to 2036 in withdrawn JSP (homes)
Bath & North East Somerset	725
Bristol City	1,625
North Somerset	1,250
South Gloucestershire	1,625

25. The Joint Spatial Plan was submitted for examination in April 2018 but was withdrawn in April 2020. Whilst that plan was never part of the strategic policy framework, it is discussed here because it was central to the process of cooperation during the earlier stages of preparation of the new Bristol Local Plan. Its withdrawal was followed by a second formal strategic process as discussed below.

West of England Spatial Development Strategy

26. Following the withdrawal of the Joint Spatial Plan a gap was created in the strategic context in which the Bristol Local Plan was being prepared. The West of England Combined Authority had been created in 2017 which included Bristol City Council, Bath & North East Somerset Council and South Gloucestershire Council (North Somerset Council did not become part of the Combined Authority). The Combined Authority was accorded strategic plan making powers, as referred to in the devolution agreement¹ and it was decided to prepare a spatial development strategy (SDS) in order to address strategic cross boundary matters.

27. The emerging Bristol Local Plan was to have been in general conformity with the SDS. The process of cooperation regarding strategic matters became focussed into the emerging SDS. However, in May 2022 its preparation was halted. The following statement was published on the West of England Combined Authority web site:

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

¹ *'The West of England Combined Authority Mayor will exercise strategic planning powers to support and accelerate these ambitions. These will include powers to: a. Adopt a statutory spatial development strategy, which will act as the framework for managing planning across the West of England region, and for the future development of Local Plans. The spatial framework will need to be approved by unanimous vote of the members appointed by constituent councils of the Combined Authority'* (Devolution agreement paragraph 41 – Source: West of England Combined Authority website)

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.

28. Whilst the SDS did not reach a draft stage and was never to become part of the strategic policy framework, it is discussed here because it was central to the on-going process of cooperation on strategic matters at the time the Bristol Local Plan continued to be prepared. It left a legacy of joint evidence which has informed the Bristol Local Plan and of continuing cooperation on strategic matters.

29. **Appendix 3** is a copy of the Statement of Common Ground for the SDS as it was at the time the preparation of that plan was halted. This evidenced the processes of cooperation and identifies the Strategic Policy Forum, the role of which is explained. The document is published on the West of England Combined Authority website.

From May 2022 – post halting of SDS

Proceeding without a spatial strategy

30. With the ending of the SDS process, the three West of England Combined Authority authorities agreed together a common statement setting out the approach to on-going joint working in respect of local plans. The common statement below was published on the councils' websites from July 2022:

Strategic Development Strategy (SDS)

Following the decision of the WECA Mayor to stop all work on the West of England Combined Authority Spatial Development Strategy, the Local Plans for Bath & North East Somerset, Bristol and South Gloucestershire will now provide the strategic planning framework for the West of England Combined Authority area.

The issue of housing need will now be addressed through individual Local Plans for each of the local councils. The councils will continue their longstanding history of joint working and cooperate with each other and with other key bodies on strategic, cross boundary matters as they prepare their local plans.

31. It was confirmed that the evidence base prepared up to that point to inform the Spatial Development Strategy would be published on the WECA website and would be reviewed and used as appropriate to inform the councils' local plans.

West of England Unitary Authorities Planning Cabinet Members' Meeting

32. On 31st January 2023 a meeting of the relevant elected members from Bristol, Bath and North East Somerset, South Gloucestershire Council and also North Somerset Council discussed joint strategic matters. At that meeting it was noted as part of discussions of housing need that the assessed Bristol housing need figure would be likely to exceed identified capacity within city boundaries and that it was likely a formalised request would be made by Bristol City Council to the other three UAs to contribute towards addressing any shortfall.

33. The meeting also discussed statements of common ground and that there would be separate statements with North Somerset Council and the relevant authorities. There would be a joint statement of common ground of the three West of England Combined

Authority councils (Bath and North East Somerset, Bristol, South Gloucestershire). These joint statements have been published (PAL006 and PAL007).

Planning Inspectorate Advisory Visit

34. On 27th September 2023, the Council received a requested advisory meeting from the Planning Inspectorate. It was conducted in accordance with the established practice for such advisory meetings. The sections related to the duty to cooperate were held jointly with representatives of Bath and North East Somerset Council and South Gloucestershire Council.

35. With regard to housing development, the informal advice noted that as unmet need could be around 30,000 homes it seemed unlikely that could be accommodated in surrounding areas. It was also noted that in the absence of a joint plan or SDS, there did not seem to be an indication of where it would be best met. The informal suggestion was that the best way forward was maybe for each surrounding authority to consider through its own plan whether it had suitable and available land in addition to that required to meet its own need that could help to meet some of Bristol's.

Letter to neighbouring authorities

36. On 31 October 2023 the city council wrote to the neighbouring authorities to formally outline its requests to consider matters under the duty to cooperate as they related to strategic matters and in particular the approach to housing need. This is the formal request referred to at the Planning Cabinet Members meeting of January 2023 (see above).

37. As indicated in the statements of common ground and below, the neighbouring authorities are considering the matters of unmet housing need through their on-going local plan process.

Neighbouring authority local plan processes

38. In accordance with the process indicated above and discussed in other evidence, the neighbouring authorities are exploring whether unmet need could be accommodated as part of the preparation of their local plans. This is subject to the latest intentions for local plan preparations which have been affected by the government's announcements on 30 July 2024. The latest published positions on the local plans are:

- **Bath and North East Somerset**

Bath & North East Somerset's new local plan has been in preparation for some time and has been subject to some regulation 18 stage consultation. The latest position is noted on the council's web site:

Local Plan update

In light of new mandatory housing targets and proposed revisions to the National Planning Policy Framework, the Local Plan is being revised.

Watch our YouTube video, which explains the implications for the Local Plan and our next steps. See the Keep up to date with our progress section below to find out more.*

(*the video advises that further information on the timetable for the local plan will be set out next year).

- **South Gloucestershire**

South Gloucestershire's new local plan has been in preparation for some time and has been subject to various regulation 18 stage consultations. This includes the most recent consultation which is referred to below (source South Gloucestershire Council web site):

Additional consultation on housing land supply

From 19 July to 13 September 2024 we undertook a further consultation (Regulation 18) on our strategy for ensuring we have adequate housing land supply and whether we can assist with Bristol City Council's unmet housing need.

This consultation took place and closed 13 September 2024. Bristol City Council made comments on the consultation requesting on-going consideration of the potential to accommodate unmet housing need – see **Appendix 2**. The latest position is reported on the South Gloucestershire Council web site:

Regulation 18 - Local Plan Topic Paper for Housing Land Supply and Bristol Unmet Need

This consultation has now closed and we are analysing the results, which will be published here in due course.

- **North Somerset**

North Somerset's new local plan has been in preparation for some time and had reached publication stage in November 2023. Following the government's announcements on 30 July 2024, the council issued the statement below. The statement refers to matters related to unmet need and joint work which is identified in the underlined section below (source North Somerset Council web site):

North Somerset Council reviewing Local Plan

3:00pm - 31 July 2024

Following the launch of consultation on the government's proposed planning reforms, North Somerset Council is reviewing its draft Local Plan.

The plan – which was first consulted on in 2020 and has been shaped by three more rounds of public consultation – was set to go out for a final round of consultation later this year, before being submitted for independent examination. This consultation will not now take place, pending consideration of the updated government guidance and any further work which may be required.

Councillor Mark Canniford, North Somerset Council's executive member who is responsible for spatial planning, placemaking and economy, said: "The government's planning reforms have major implications for our proposed Local Plan.

"The new standard method is 23,805 dwellings in North Somerset over the next 15 years – that's nearly 9,000 dwellings more than our current Local Plan target. This figure also doesn't take into account the needs of our neighbours, as the government has asked all councils to work together to jointly address unmet need.

"In light of this, we will not be proceeding with our planned final consultation on the Local Plan. We're working hard to review our draft plan in the light of the government's announcements, and hope to progress this as quickly as we can.

“As a council, we support the government’s commitment to growth and meeting the housing need of our communities. All our communities will need to play a role in helping to meet this challenging housing requirement, and we’ll work closely with them as we develop a revised plan.

“However, we want to create a Local Plan that also reflects the needs of our environment. Around 85 per cent of our land is at risk from flooding, part of the Mendip Hills landscape, high-quality Green Belt or protected in other ways for environmental or heritage reasons. This is a practical geographic constraint on the amount of development that’s possible in North Somerset.

“New homes also need to be supported with the right infrastructure, so communities have access to the services they want and need. We want to make sure that infrastructure challenges are being met before we consider further development.

“We appreciate that this has been a long process. It’s really important that we get our Local Plan right, as this will shape development in our area for the next 15 years. Thank you to our residents for your patience, and to our officers for their continued hard work.”

The most recent statement about the local plan is copied below (source North Somerset Council web site):

North Somerset Council preparing updated Local Plan

9:43am - 24 September 2024

The council is updating its draft Local Plan to identify potential new locations for development in North Somerset, to help meet the government’s new higher housing target for the district of 23,805 new homes over 15 years.

At the end of July, the government announced proposed changes to planning rules which significantly increases the number of new homes required in North Somerset. Read more in our previous news release: <https://n-somerset.gov.uk/news/north-somerset-council-reviewing-local-plan>

The council is now working towards identifying where additional development is possible at sustainable locations across North Somerset, outside areas at risk of flooding or other significant constraints.

The council will be assessing potential locations for new development using the following hierarchy:

Development that maximises urban capacity, focusing on previously developed land and reviewing densities.

Development at the towns (outside the Green Belt).

Development at the larger, most sustainable villages (outside the Green Belt).

Development in the ‘Grey Belt’ in sustainable locations. The government defines the Grey Belt as Green Belt which is either brownfield or makes a limited contribution to Green Belt purposes. The council is reviewing the Green Belt in North Somerset to identify which areas meet this definition.

Development in the Green Belt adjacent to Bristol and at the towns.

Development in the Green Belt at the larger, most sustainable villages.

North Somerset Council will be consulting on the potential locations to address the government's new housing target in early 2025. This will need to take account of delivery and infrastructure issues, such as strategic transport improvements and the provision of other infrastructure.

After reviewing feedback, the council will amend the draft Local Plan and run a final round of consultation later in 2025, before submitting the plan for examination by an independent inspector.

Councillor Mark Canniford, North Somerset Council's executive member who is responsible for spatial planning, placemaking and economy, said: "With the new government's significantly higher housing target of 23,805 new homes over 15 years, we now have to find space for an extra 8,530 homes over the plan period.

"And as well as new homes, it's vital we have the infrastructure, jobs and facilities in place to support this extra development. We will be looking to the government to help deliver the investment and policies to help us to do this.

"This is an enormous challenge and will result in new development being required in many new locations across North Somerset.

"Around 85% of land in North Somerset is at risk from flooding, part of the Mendip Hills landscape, high-quality Green Belt or protected in other ways for environmental or heritage reasons.

"With this in mind, we'll try to maximise development in our urban areas as much as we can. However, the government have been clear that we need to deliver their housing target, even if that means development in the Green Belt.

"This will be a last resort, but because we have to find space for so many extra houses, this may be our only option in some cases.

"All our communities have a role to play here and should prepare themselves for potentially seeing more development in their area. We want to work closely with them on this. Please do get involved in the consultations next year and look out for further updates from us."

For more information on the Local Plan, visit www.n-somerset.gov.uk/localplan2040

Continuing cooperation

39. As the preparation of the neighbouring authority plans continues, the duty to cooperate means that effective cooperation extends into the preparation of those plans. Bristol City Council will cooperate with the neighbouring authorities on strategic matters. Mechanisms of cooperation will include:

- Continuing routine liaison meetings of officers including West of England Combined Authority officers;
- Preparation and consideration of joint evidence;
- Plans consultations;
- Elected member meetings.

2. Collaboration on strategic matters

40. In accordance with paragraph 25 of the NPPF (September 2023), the council has collaborated with its partner strategic policy-making authorities to identify the relevant strategic matters to be addressed across the local plans. The process for this is referred to above and the strategic matters are discussed in the two statements of common ground, (PAL006 and PAL007).

41. Whilst other matters are referred to, the strategic matter that has greatest prominence is that of unmet housing need which is being addressed through the mechanisms described above.

42. No representations have been received from the adjoining strategic policy-making authorities to indicate any concerns regarding the process of collaboration and cooperation in respect of strategic matters.

3. Engagement with the local community and relevant bodies

43. The NPPF also advises that strategic policy-making authorities 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).

44. The national planning practice guidance observes that certain public bodies are also subject to the duty to cooperate and that these organisations are required to cooperate with local planning authorities (paragraph 030). All parties are advised in that paragraph to approach the duty in a proportionate way, tailoring cooperation according to where they can maximise the effectiveness of plans.

45. **Appendix 1** details the engagement with the prescribed bodies who are not local planning authorities. This is in addition to the meetings of the Strategic Planning Forum referred to as part of the halted West of England Spatial Development Strategy (see paragraph 2.5 in Appendix 3).

46. The council considers that public bodies have cooperated on the preparation of the local plan as regards strategic matters and there have been no representations regarding any failure of these bodies to cooperate, or related to the outcome of such cooperation and its reflection in the local plan. The bodies have similarly not made representations indicating concerns regarding cooperation on strategic matters.

Representations to publication version

47. Representations on the published local plan (November 2023) have not indicated that the council has failed to comply with the duty to cooperate regarding strategic matters. Representations are reported in other examination documents but the representations

received on this matter are summarised below in turn (*in italics*), with an explanation of how the council considers it has complied with the duty:

- *Concern that the council had not met its duty to cooperate with adjoining local planning authorities on strategic policy matters was raised in relation to how unmet housing need in Bristol would be accommodated in neighbouring authority areas, the absence of a statement of common ground which detailed an agreed approach to meeting this need was noted by representors from the housing development industry / landowners.*

The council has complied with the duty to cooperate and maintained effective cooperation in response to strategic matters as set out in this paper and elsewhere. Statements of common ground have been published and those refer to the on-going process of considering how unmet housing need could be accommodated.

- *SevernNet (Representor Ref. No. 389) thought there had been inadequate cross-boundary coordination regarding the Portbury, Avonmouth and Severnside areas. They felt that, by focussing on Avonmouth rather than also considering Portbury in North Somerset and Severnside in South Gloucestershire, opportunities had been missed to provide a more positive strategy for the area as a whole, for example by identifying common opportunities and challenges such as transport and infrastructure requirements.*

Part of the Avonmouth Severnside Enterprise Area falls within the area covered by the Bristol Local Plan. The Portbury section of Bristol Port is across the River Avon in North Somerset.

The approach to this area is subject of coordinated work across the local authorities. For example, the Avonmouth Severnside area is specifically considered within the Joint Local Transport Plan which identifies approaches to transport infrastructure in the areas. The area has also been provided with enhanced flood defences through the Avonmouth Severnside Enterprise Area (ASEA) ecology mitigation and flood defence construction project to reduce the flood risk and protect areas along the stretch of coastline from Shirehampton in Bristol to Aust in South Gloucestershire.

The statements of common ground refer to cooperation between the authorities. Policy E4 Avonmouth Industrial Area and Bristol Port sets out approach to development in this location, set within the wider context of the Avonmouth Severnside Enterprise Area. The policy is consistent with approaches to the wider enterprise area.

- *David Gray (303) considered there had been a failure to carry out crossboundary work on reducing transport-related air pollution, commuting and carbon emissions.*

The statements of common ground refer to cross boundary working on these matters. Transport plans for the area covered by the local plan are joint. Evidence which informed policies for net zero has been prepared jointly.

4. Unmet needs and infrastructure

48. The National Planning Policy Framework indicates that joint working should help to determine where additional infrastructure is necessary. The statements of common ground refer to infrastructure matters.

49. It is evident that meeting of unmet needs and in particular unmet housing need is a key focus of the intended outcomes of the duty to cooperate process. This logically flows from the duty's creation and its role in replacing strategic planning systems which had been specifically designed to deal with the distribution of development needs across strategic planning areas.

50. National planning policy and guidance make numerous specific references to meeting of unmet need including for example in NPPF paragraph 11 which says:

'strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas'.

51. The government's July 2024 paper particularly references such matters. The paper says that the government was clear in its manifesto that housing need in England cannot be met without planning for growth on a larger than local scale and referred to the necessity of introducing *'effective new mechanisms for cross-boundary strategic planning'*. Reference is also made to ensuring, under the outgoing duty, that the right engagement is occurring on the sharing of unmet housing need where plans are being progressed. Revisions to the NPPF are proposed to address this.

52. The published statements of common ground refer to unmet housing need and the addressing of unmet housing need is at the core of the process of cooperation referred to in the information set out in this topic paper.

5. Statements of Common Ground

53. The National Planning Policy Framework says that in order to demonstrate effective and on-going joint working, strategic policy-making 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.

54. Statements of common ground with the neighbouring authorities have been prepared and are part of the evidence for the examination of the Bristol Local Plan (PAL006 and PAL007).

Appendix 1

Prescribed bodies

Summary of consultation carried out on the Bristol Local Plan with the non-local planning authority public bodies prescribed for the purposes of section 33A(1)(c) of the Planning and Compulsory Purchase Act 2004 (as amended)

Duty to cooperate public body	Summary of consultation, strategic matters raised and outcomes
<p>Environment Agency</p>	<ul style="list-style-type: none"> • Consultation carried out: <ul style="list-style-type: none"> ○ Consulted at each local plan preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document). ○ Liaison meetings between BCC and Agency officers outside of local plan consultations took place to discuss ongoing matters. • Strategic matter raised: <ul style="list-style-type: none"> ○ In their responses to local plan consultations the Agency emphasised the importance of dealing with flood risk in a strategic manner, highlighting that strategic flood defence improvements and infrastructure can extend into neighbouring authorities. • Outcomes of cooperation: <ul style="list-style-type: none"> ○ <u>Bristol Avon Flood Strategy and Local Plan Policy FR2</u> Since 2018, BCC has been working with the Agency to develop the Bristol Avon Flood Strategy, the council’s long-term plan to manage flood risk from the Avon. Endorsed by Cabinet in March 2021 it proposes a range of flood defence improvements. The strategy is reflected in Local Plan Publication Version (CSD001) Policy FR2: Bristol Avon Flood Strategy. The policy enables development to take place in areas which will benefit from greatly reduced flood risk upon delivery of the strategy’s planned flood

Duty to cooperate public body	Summary of consultation, strategic matters raised and outcomes
	<p>defences. It also expects development to assist in delivering the flood defences.</p> <ul style="list-style-type: none"> ○ <u>Avonmouth Severnside Enterprise Area Ecology Mitigation and Flood Defence Project and Local Plan Policy E4</u> Since 2016, BCC has been working with the Agency and South Gloucestershire Council on this project which will provide improved flood defences and ecological mitigation to enable continued economic growth in the Avonmouth Severnside Enterprise Area and protect existing homes at risk of flooding. <p>When complete in 2026/27, 17km of improved flood defences from Lamplighter’s Marsh in Bristol in the south to Aust in South Gloucestershire in the north will have been delivered. Within BCC’s administrative area a new c.95 hectare compensatory wildlife habitat at Hallen Marsh was completed in March 2024 and is identified on the submission Policies Map accompanying the new local plan.</p> <p>The delivery of the project’s flood defence and ecological improvements has informed and enabled the approach proposed by Local Plan Publication Version (CSD001) Policy E4: Avonmouth Industrial Area and Bristol Port.</p> <p>Policy E4 will ensure that previously developed land in this location continues to be renewed for new forms of business space, while also allocating 60 hectares of greenfield land to support continued growth in this regionally-important economic development location.</p>
Historic England	<ul style="list-style-type: none"> ● Consultation carried out: <ul style="list-style-type: none"> ○ Historic England were consulted at each local plan preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document).

Duty to cooperate public body	Summary of consultation, strategic matters raised and outcomes
	<ul style="list-style-type: none"> ○ Liaison meetings between BCC and Historic England officers outside of local plan consultations took place to discuss ongoing matters. ● The issues raised by Historic England in response to local plan consultations related to specific policies rather than strategic matters.
Natural England	<ul style="list-style-type: none"> ● Consultation carried out: <ul style="list-style-type: none"> ○ Natural England were consulted at each local plan preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document). ● Strategic matters raised: <ul style="list-style-type: none"> ○ In their responses to local plan consultations Natural England identified the importance of assessing the effects of local plan policies on Bristol’s European designated sites as well as those in neighbouring authorities. <p>Their comments also highlighted the importance of local plan policies incorporating strategic aims relating to nature and green infrastructure, highlighting that ecological networks can extend across administrative boundaries.</p> ● Outcomes of cooperation: <ul style="list-style-type: none"> ○ <u>Habitats Regulations Assessment of European sites</u> <p>The HRA Screening Report was issued to Natural England for comment on 2 August 2023. Comments were received from Natural England on 25 August 2023. They agreed with the main outputs of the Report and the likely significant effects on Habitats Sites that were identified for further consideration through the Appropriate Assessment.</p> <p>The council published the ‘Habitats Regulations Appropriate Assessment of the Local Plan Submission Stage’ (PAL005) in April 2024. It concluded overall that adverse effects on integrity on the relevant sites will</p>

Duty to cooperate public body	Summary of consultation, strategic matters raised and outcomes
	<p>not arise from the local plan. Comments from Natural England on the Appropriate Assessment were sought.</p> <ul style="list-style-type: none"> ○ <u>Cross-boundary nature and green infrastructure connections</u> <p>Policy text was included in Local Plan Publication Version (CSD001) Policies BG1 ‘Green infrastructure and biodiversity in new development’ and BG2 ‘Nature conservation and recovery’ to address the issue of ecological interests extending across administrative boundaries.</p> <p>For example, both policies expect new development to have regard to connecting with or enhancing the integrity of the Nature Recovery Network and wider ecological networks. Introductory text to Policy BG1 explains that the emerging Nature Recovery Network identifies ecological networks at both a West of England and Bristol-level.</p>
Mayor of London	<p>It was not appropriate to consult the Mayor of London as the policies and proposals of the Local Plan do not have cross-boundary impacts relevant to the interests and responsibilities of the Mayor of London. Bristol is located 100 miles from London and does not adjoin the Greater London Authority area.</p>
Civil Aviation Authority	<ul style="list-style-type: none"> ● Consulted at each local plan preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document). ● No comments were received.
Homes England	<ul style="list-style-type: none"> ● Consulted at each local plan preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document). ● Homes England and BCC work jointly on a number of key projects in the city delivering new and affordable homes. For example, along with the West of England Combined Authority and Network Rail, Homes England is a partner in the Temple Quarter regeneration programme. This is one of the UK’s

Duty to cooperate public body	Summary of consultation, strategic matters raised and outcomes
	<p>largest regeneration projects, transforming 135 hectares of brownfield land to deliver sustainable new homes, jobs, infrastructure, and opportunities.</p> <ul style="list-style-type: none"> • The issues raised by Homes England in response to the local plan consultation documents related to specific policies rather than strategic matters.
<p>NHS Integrated Care Board (NHS Integrated Care Boards replaced NHS Clinical Commissioning Groups in July 2022 as a result of the Health and Social Care Act 2022)</p>	<ul style="list-style-type: none"> • The NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board and its predecessor body (NHS Bristol, North Somerset & South Gloucestershire Clinical Commissioning Group) were consulted at each local plan preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document). • No comments were received.
<p>NHS England</p>	<ul style="list-style-type: none"> • Consulted at each local plan preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document). • No comments were received.
<p>Office of Road and Rail</p>	<ul style="list-style-type: none"> • Consulted at each local plan preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document). • No comments were received.
<p>Transport for London</p>	<p>It was not appropriate to consult Transport for London as the policies and proposals of the Local Plan do not have cross-boundary impacts relevant to the interests and responsibilities of TfL. Bristol is located 100 miles from London and does not adjoin the Greater London Authority area.</p>

Duty to cooperate public body	Summary of consultation, strategic matters raised and outcomes
Each Integrated Transport Authority	Not applicable. There is no integrated transport authority in the area.
Each Highway Authority	<ul style="list-style-type: none"> • <u>Bristol City Council</u> Bristol City Council is the Highways Authority for the Bristol City Council administrative area. • <u>West of England Combined Authority (WECA)</u> As part of WECA, the council works with the Highway Authority of the other WECA councils (i.e. Bath and North East Somerset and South Gloucestershire Councils) as well as North Somerset Council in producing the West of England Joint Local Transport Plan. <ul style="list-style-type: none"> ○ WECA was consulted at each local plan preparatory stage. ○ No comments were received. • <u>National Highways:</u> <ul style="list-style-type: none"> ○ Consultation carried out: <ul style="list-style-type: none"> ▪ Consulted at each local plan preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document). ▪ Quarterly liaison meetings between BCC and National Highways officers to discuss ongoing matters took place during the preparation of the local plan. ○ Strategic matter raised: <ul style="list-style-type: none"> ▪ National Highways’ comments highlighted the need for an assessment to be made of the implications of the local plan’s policies on the strategic road network. ○ Outcomes of cooperation: <ul style="list-style-type: none"> ▪ Transport modelling has been discussed with National Highways throughout the preparation

Duty to cooperate public body	Summary of consultation, strategic matters raised and outcomes
	<p>of the local plan. The results of this modelling form part of the evidence for the examination, namely 'WERTM Local Plan Modelling Outputs Report' (EXA024a) published in July 2024.</p> <p>The report notes that the 'primary message from this modelling exercise is that adding additional housing and jobs (associated with the local plan) does not lead to a proportionate increase in highway trips across the network; the majority of the extra trips are made using sustainable modes of transportation.'</p> <p>Sustainable modes of transportation are promoted by the Local Plan Publication Version (CSD001), particularly Policies T1 'Development and transport principles' and T2 'Transport infrastructure improvements'.</p> <p>The council considers that any significant transport impacts of development proposals will be appropriately assessed through the Transport Assessment/Statement and Travel Plan process. This is required by the NPPF (September 2023, para. 113) and Local Plan Publication Version (CSD001) Policy T3A 'Transport development management'.</p> <ul style="list-style-type: none"> • The council has regular liaison meeting with National Highways.
Marine Management Organisation	<ul style="list-style-type: none"> • Consulted at each local plan preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document). • No comments were received.

Other prescribed bodies

Section 33A of the Planning and Compulsory Purchase Act 2004 also refers to other prescribed bodies which are not subject of the duty but with which the other prescribed bodies must cooperate (National Planning Practice Guidance paragraph 030 refers):

- each local enterprise partnership; and

- each local nature partnership.

Other prescribed body	Summary of consultation and outcomes
Each Local Enterprise Partnership	<ul style="list-style-type: none"> • The West of England Local Enterprise Partnership was consulted at each local plan preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document). • No comments were received. <p>Central government support (core funding) for Local Enterprise Partnerships ceased from April 2024 with their functions transferred to local and combined authorities. The West of England Local Enterprise Partnership Board last met in January 2024.</p>
Each Local Nature Partnership	<ul style="list-style-type: none"> • The West of England Local Nature Partnership was consulted at each preparatory stage (2018 Local Plan Review: Consultation document; 2019 Local Plan Review: Draft Policies and Development Allocations – Consultation document; and 2022 Local Plan Review: Draft Policies and Development Allocations – Further Consultation document). • A response was received to the 2018 Local Plan Review: Consultation document. No strategic matter was raised. • No further comments received at subsequent stages.

Appendix 2

Copy of Bristol City Council's response to the consultation on South Gloucestershire emerging local plan July 2024



South Gloucestershire Local Plan Consultation July 2024: Bristol City Council response

Bristol City Council notes the consultation paper published by South Gloucestershire Council in July 2024 and offers the following observations.

Bristol City Council notes the proposals in the consultation paper to increase the local plan housing requirement and allocate additional sites for development. The stated purpose of this increase is to de-risk the housing requirement by adding a buffer of around 10% relative to South Gloucestershire's housing need as defined by the Government's standard method. With reference to the provisions of the December 2023 NPPF in relation to housing need and the Green Belt, the consultation paper indicates that there is no capacity to meet any of Bristol's unmet housing need.

Bristol City Council requests that South Gloucestershire Council continues to consider the potential for meeting some of Bristol's unmet housing need before the local plan goes to its Regulation 19 publication stage, having regard to consultation feedback and emerging national planning policy. Bristol City Council further suggests that the Regulation 19 local plan commits to an early or immediate review so that issues of unmet need can continue to be explored. The City Council will make similar observations regarding the plans of its other neighbouring authorities.

If sufficient development allocations cannot be identified to meet a proportion of Bristol's unmet housing need at this stage, Bristol City Council suggests that the local plan could consider identifying potential options for future growth, for instance

‘safeguarded land’ (NPPF para.148) or longer-term contingencies that might be considered for development as part of a future local plan, subject to the necessary investment in infrastructure.

In the short to medium term, proposed changes to national planning policy² have several potential implications for local plans, including a proposed requirement for Green Belt review where necessary to meet housing needs, a proposed strengthening of the duty to co-operate and proposed changes to the Government’s standard method for assessing local housing need.

The proposed changes to the standard method are significant for Bristol and the wider West of England area. If the proposed standard method is adopted by the Government, although Bristol’s housing need figure will decrease overall its unmet need will be 1,132 homes per annum. This represents an increase from the amount previously put forward by Bristol City Council under the duty to co-operate, which was 578 homes per annum focused on the locally derived element of the current standard method. Bristol City Council notes that South Gloucestershire’s own housing need figure is also projected to increase if the proposed standard method is adopted.

Bristol City Council notes the challenges associated with this level of sub-regional growth and would support working together to press for the resources and new infrastructure required to support it.

² [Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system)

Appendix 3

West of England Combined Authority Area Statement of Common Ground for Strategic Planning - Version 3: January 2022

The document appended is published on the West of England Combined Authority web site:
[WECA Area Statement of Common Ground Version 1](#)

West of England Combined Authority Area

(Bristol City, Bath & North East Somerset and South Gloucestershire)

Statement of Common Ground for Strategic Planning Version 3: January 2022

EXECUTIVE SUMMARY

The purpose of a Statement of Common Ground

A Statement of Common Ground (SoCG) is a document recording the collaboration between adjoining authorities and infrastructure providers in seeking to resolve cross-boundary issues. This statement provides a record of the decisions made in addressing these through various discussions and joint-working where appropriate. The Statement of Common Ground demonstrates fulfilment of the obligation set out in the 2019 National Planning Policy Framework to demonstrate ‘effective and ongoing joint working’ through ‘documenting the cross-boundary matters being addressed and progress in cooperating to address these’.

An over-arching Statement of Common Ground for the West of England Combined Authority area

This is an over-arching SoCG documenting the strategic matters and issues to be addressed through either the West of England Combined Authority area Spatial Development Strategy (SDS) and/or the constituent authority Local Plans. The document has also been taken through the West of England Strategic Planning Forum to ensure signoff of relevant content from other bodies.

- Version 1 of the West of England Combined Authority Area Statement of Common Ground was published in September 2020 and identified potential matters for cross-boundary consideration, the approach to joint commissioning of evidence base for the SDS, and the approach to joint working for the SDS and constituent Local Plans. Due to strong functional relationships in the West of England area and joint

commissioning of evidence base with North Somerset, Version 1 of the Statement of Common Ground included North Somerset as a signatory (as well as the Combined Authority and its three constituent authorities).

- Version 2 of the Statement of Common Ground was published in October 2021¹ and provided an update on joint working relating to the outputs of SDS evidence including employment land, housing need and infrastructure issues and options. The signatories to Version 2 were the Combined Authority and its three constituent authorities.
- Version 3 (this version) provides a further update documenting the outputs of SDS evidence to support and inform the Spatial Development Strategy, including ongoing engagement with infrastructure providers. It also reflects some initial outputs of spatial scenario appraisal and policy scoping and documents cross boundary issues that have been identified through this process.

Strategic matters requiring cross-boundary collaboration

In the first version of the Combined Authority area SoCG, the following matters were identified as having cross-boundary dimensions to be explored through plan-making, initially through the evidence base which helps to identify issues and opportunities that can be addressed through plans. The issues identified (and that form the structure of the Statement of Common Ground) are:

- Carbon emissions and air quality
- Health inequality
- Housing
- Employment
- Green Belt
- Development Quality
- Transport
- Utilities including Waste; Security and Resilience; and Social Infrastructure
- Green Infrastructure & Natural and Historic Environmental Assets
- Minerals

Appendix 1 summarises the agreement reached on the above topics in Versions 1, 2 and 3 of the Statement of Common Ground.

Key matters covered in this version of the SoCG

- An additional section on spatial scenario appraisal has been added (section 5). This sets out the four spatial scenarios that have been developed for appraisal, and

¹ Version 1 and Version 2 of the Statement of Common Ground are available from:
<https://www.westofengland-ca.gov.uk/what-we-do/planning-housing/spatial-development-strategy/>

additional components of growth that have been considered. Early indications suggest that a combination of scenarios and additional growth components will best address the SDS strategic objectives whilst meeting national policy objectives.

- Neighbouring authorities have been approached to explore whether any of the Combined Authority's unmet need can be accommodated cross boundary prior to considering the use of Green Belt or flood risk areas (see paragraphs 6.10 – 6.19)
- Ongoing work on the infrastructure evidence base has helped identify cross-boundary transport and connectivity issues that may arise (or be exacerbated) by the spatial scenarios. The key issues arise largely from the scale of growth anticipated (on top of the existing constraints identified) and the challenges this presents to infrastructure capacity and resilience and demand management. Potential cross-boundary issues have also been identified resulting from growth at the boundaries of the West of England Combined Authority (both within WECA and over the border in neighbouring authorities). Ongoing discussions with National Highways in relation to the impact of significant additional growth in the SDS area on the Strategic Road Network are documented in paragraphs 6.49 – 6.53.
- Discussions to date with the Environment Agency, in particular in relation to concerns raised by the Environment Agency regarding the scale of new homes proposed in Flood Zone 3a under scenario 1 (flood risk variant and subsequent scenarios that incorporate this), are also documented in this version of the SoCG (see paragraphs 6.74 – 6.79).

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Appendix 1: Agreements reached on strategic matters in the West of England Combined Authority area Statement of Common Ground Versions 1, 2 and 3

Appendix 2: Strategic Planning Forum Membership, December 2021

1. Introduction

- 1.1 Authorities involved in plan-making are required to cooperate with each other and other bodies when preparing plans which address strategic, cross–boundary matters. This includes strategic policies in Spatial Development Strategies and Local Plans.
- 1.2 The parameters, geography and governance of this Statement of Common Ground (SoCG) are detailed in version 1 and summarised in Appendix 1 of Version 2. Therefore, they are not repeated here.

2. Parties Involved & Signatories

Signatories

- 2.1 Signatories to Version 3 of the Statement of Common Ground are the West of England Combined Authority constituent Unitary Authorities (UAs) (South Gloucestershire Council (SGlos), Bath & North East Somerset Council (B&NES), Bristol City Council (BCC)) and the West of England Combined Authority (including the West of England Transport Authority).
- 2.2 There is no requirement for each of the authorities within the Combined Authority area to be signatories to SoCG prepared for the SDS nor for the WECA Mayor to sign their respective Local Plan SoCG². However, given considerable overlap in the issues, and the requirement for the WECA UAs to have SoCGs with each other for their Local Plans it is appropriate for there to be one WECA-wide area SoCG. This will cover cross boundary strategic matters that may be dealt with as strategic policies in the SDS or constituent authority Local Plans and will avoid a series of separate or bilateral statements. Supplementary Local Plan SoCGs will be prepared as necessary.
- 2.3 In addition to the above signatories (for the whole Statement of Common Ground), the following signatories agree the following sections as an accurate record of areas of common ground:
 - Box 8 (Page 22) - National Highways
 - Box 10 (Pages 30) – Environment Agency

² NPPG Paragraph: 028 Reference ID: 61-028-20190315

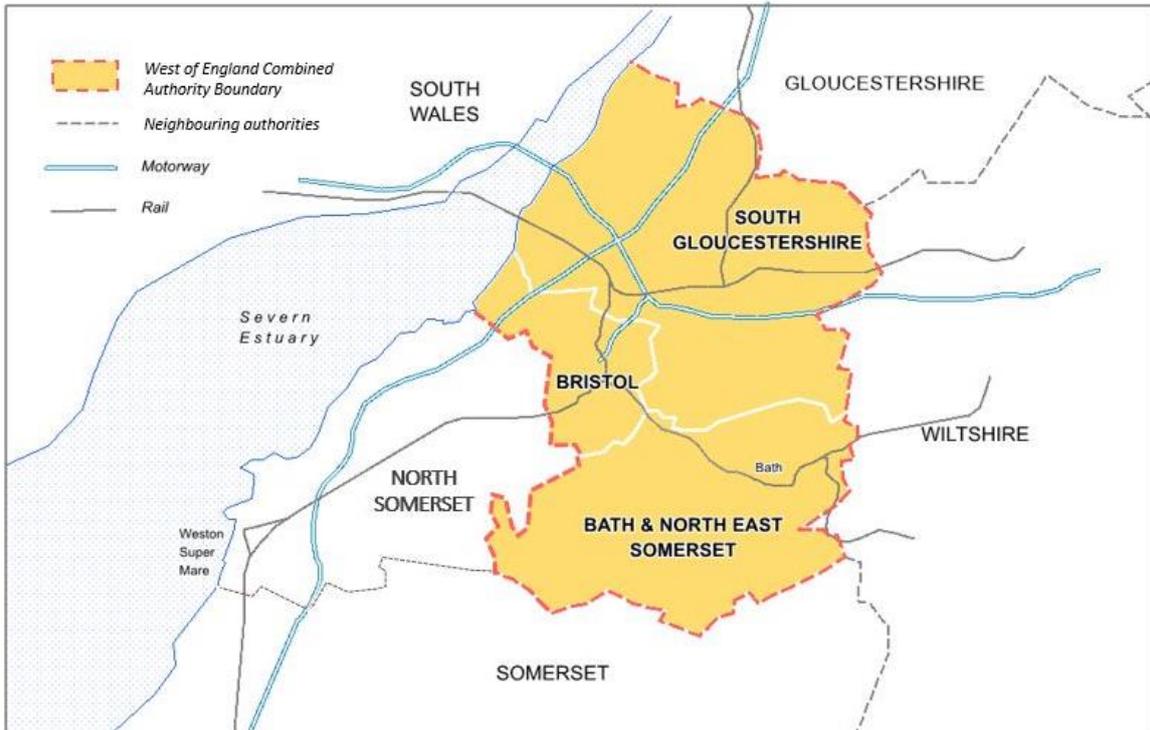


Figure 1: Area covered by the Statement of Common Ground

- 2.4 The document has also been taken through the West of England Strategic Planning Forum to ensure signoff of relevant content from Duty to Co-operate bodies and neighbouring authorities as allowed for through the Strategic Planning Forum terms of reference.
- 2.5 The West of England Strategic Planning Forum comes together periodically to review the conclusions of strategic evidence and provide a platform for collaborative discussions between strategic bodies. These discussions feed in to the SoCG which members of the Strategic Planning Forum are then asked to sign off. Membership of this forum includes neighbouring authorities, prescribed bodies and infrastructure providers and is reviewed periodically to ensure it reflects cross-boundary issues under discussion. The current membership is set out in Appendix 2.
- 2.6 The Strategic Planning Forum has met five times since August 2020. This engagement with statutory bodies and infrastructure providers has been supplemented with bilateral discussions with the following organisations:
- Bristol Water
 - Department for Education
 - Department for Transport
 - Environment Agency
 - Highways England
 - Historic England
 - Natural England

- NHS Bristol, North Somerset and South Gloucestershire CCG
- Office for Health Improvement & Disparities
- Open Reach
- South West Energy Hub
- Wales & West Utilities
- Wessex Water
- West of England Nature Partnership
- Western Power Distribution

Confirming that agreement has been reached on the strategic matters as set out in boxes 1 to 13 below:

Organisation: South Gloucestershire Council

Name & Position: Nigel Riglar, Director of Environment and Community Services

Signed:

Date: 28th January 2022

Organisation: Bristol City Council

Name & Position: Stephen Peacock, Director of Regeneration and Growth

Signed:

Date: 31st January 2022

Organisation: Bath & North East Somerset Council

Name & Position: Sophie Broadfield, Director of Sustainable Communities

Signed:

Date: 27th January 2022

Organisation: West of England Combined Authority

Name & Position: Kathryn Vowles, Interim Director of Infrastructure

Signed:

Date: 31st January 2022

2.7 Joint working with the organisations listed above also takes place through working groups and partnerships that work together to address relevant strategic matters. These include:

Forum	Membership includes
West of England Green Infrastructure Working Group	Bristol Avon Catchment Partnership Environment Agency Natural England West of England Combined Authority

	West of England Nature Partnership West of England Unitary Authorities
Western Gateway Economic Partnership	Cardiff Capital Region Cardiff City Council Gloucestershire Local Enterprise Partnership Newport City Council Swansea Bay City Deal Swansea Council Swindon Borough Council Swindon Wiltshire Local Enterprise Partnership West of England Combined Authority West of England Local Enterprise Partnership West of England Unitary Authorities Wiltshire Council
Western Gateway sub-national transport body	Department for Transport National Highways Network Rail
West of England Nature Partnership (WENP)	Avon Wildlife Trust Bristol Avon Catchment Partnership Bristol Water Environment Agency Forest of Avon Trust National Farmers Union National Trust Natural History Consortium Natural England Wessex Water West of England Combined Authorities West of England Unitary Authorities Woodland Trust

2.8 Bilateral Duty to Cooperate discussions with neighbouring authorities have also taken place on an active and ongoing basis both to inform the development of the West of England SDS and Local Plans, but also as part of Duty to Cooperate requirements for Local Plans in neighbouring authorities. These are documented here and in the Statements of Common Ground for Local Plans coming forward in neighbouring authorities including:

- Statement of Common Ground between Stroud District Council and South Gloucestershire Council (October 2021)³

³ See Stroud Local Plan Review Duty to Cooperate paper. Available from: <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review/local-plan-examination/examination-library>

- Statement of Common Ground between Bath & North East Somerset Council and Mendip District Council (December 2020)⁴

3. Spatial Development Strategy Plan period

- 3.1 The Combined Authority and the constituent authorities have agreed that the SDS will have a 20-year plan period (2022 to 2042). This will provide the over-arching framework within which the UA local plans will come forward. Local Plans must demonstrate that they plan for at least 15 years post adoption.
- 3.2 The 20-year plan period is appropriate for the SDS as it will cover issues of strategic importance such as infrastructure provision that play out over many years and allow for lead-in times for major development sites. The SDS start date will be 2022 which aligns with the submission date as currently proposed.

4. Strategic Planning Matters requiring cross boundary collaboration

- 4.1 The National Planning Policy Framework (NPPF) paragraph 20 sets out the key strategic matters that Development Plans must address. It is for the authorities to define which issues need cross boundary collaboration to best address them. In doing so the following factors have been and will continue to be considered as plan-making progresses:
- Whether national policy requires cross-boundary exploration of an issue (e.g. housing need and capacity);
 - Whether the matter needs a co-ordinated or otherwise aligned approach to best achieve strategic objectives; and
 - Whether the development or use of land would have a significant [direct or indirect] impact on at least two planning areas.
- 4.2 Version 1 of the SoCG set out how these principles had been considered, the relevant geographical areas over which collaboration will logically [or already] occur[s], and the scoping of joint evidence to identify matters or specific issues of relevance to the SDS. This did not imply that there will be an individual policy on these issues in either the SDS or Local Plans as this will be determined in an evidence-led way.
- 4.3 Version 2 of the SOCG documented cross boundary issues arising from findings of key SDS evidence base reports. The evidence included early analysis of infrastructure issues and options, the Employment Land Spatial Needs Assessment (ELSNA) and Local Housing

⁴ Available from Mendip District Council website: https://www.mendip.gov.uk/media/26873/AP2-1-BNES-MDC-Statement-of-Common-Ground-Redacted/pdf/AP2-1_-_BANES_MDC_Statement_of_Common_Ground1.pdf?m=637432803021170000

Needs Assessment (LHNA). These documents were published alongside other methodology papers (for the SHLAA and HRA) in October 2021⁵.

5. Spatial scenario appraisal

- 5.1 The SDS will set out a spatial strategy for growth to meet the need for homes and jobs in a clean and inclusive way across the West of England Combined Authority area over the next 20 years. This will be based on capacity, (reflecting constraints and impacts) and what is deliverable. It will set the framework for the Local Plans that sit beneath it to allocate sites for development but needs to provide sufficient evidence to demonstrate a ‘reasonable prospect’ of delivery whilst supporting the SDS strategic objectives. The spatial scenario appraisal therefore uses a degree of spatial specificity to capture the form in which scenarios could be delivered.
- 5.2 Four spatial scenarios have been developed for appraisal, incorporating different infrastructure intervention assumptions which build on a core scenario (scenario 1, which reflects a baseline of already committed interventions), and looking at variants with and without recourse to locations affected by Green Belt and flood risk. Urban intensification is considered as part of the baseline and is therefore common to all scenarios.
- 5.3 A summary of the scenarios is provided below:
- **Scenario 1:** baseline scenario. Committed development plus infrastructure schemes that are ‘near certain’ or ‘highly likely’ to be delivered (and therefore considered ‘committed’). This scenario is focused within existing urban areas and committed transport improvements including Metrobus in North and SW Bristol, cycling, Metrowest regional rail improvements and key corridor improvements in the urban area of Bristol.
 - **Scenario 2:** Baseline plus key strategic corridor enhancements. This scenario includes bus corridor enhancement including new routes to improve service reliability, speed and frequency from:
 - A4 Bristol to Bath (note this is included in the base/core scenario)
 - A432 Bristol to Yate
 - A38 Bristol to Thornbury
 - A37/A362/A367 to Norton Radstock/Bath/Bristol
 - **Scenario 3:** Baseline plus new sustainable transport hubs/nodes. Includes rail-based interventions that extend suburban connectivity and enhance urban density potential. This includes Charfield Station and other new stations being considered through the strategic rail programme at Ashton Gate and St Anne’s Park. In this scenario, increased weighting is given to other stations where service improvements are committed as

⁵ These documents are available on the West of England Combined Authority website:
<https://www.westofengland-ca.gov.uk/what-we-do/planning-housing/spatial-development-strategy/>

part of the Metro West 2 work (St Andrews Road, Severn Beach, Henbury, North Filton)

- **Scenario 4:** Baseline plus extension of urban sustainable transit to fringe areas. This scenario looks at extending urban transport (Mass Transit, Metrobus or Greater Bristol Bus Network (GBBN) type routes) where significant potential development could justify this.

- 5.4 Scenario appraisal includes consideration of evidence concerning potential capacity. Through this process it was evident early on that no single scenario will meet the level of housing need identified for the area through the Local Housing Needs Assessment (LHNA), nor would an approximate sum of all four scenarios. Therefore, four further components of growth are being considered as part of the scenario appraisal:
- i. Non-strategic growth in walkable locations not part of the main scenarios
 - ii. Proactive search in similar locations to the main scenarios, supplementing 'potential' capacity promoted through the authorities' call for sites processes
 - iii. Density and delivery uplifts in the urban areas, particularly Bristol
 - iv. Sub-optimal locations related to scenarios 2 and 4 but with greater delivery challenges (scenario 2+ and 4+)
- 5.5 Scenario appraisal is drawing on a variety of evidence to review compatibility of the scenarios and their constituent broad locations for growth and infrastructure assumptions with the plan's strategic objectives, legal obligations and other key national policy requirements. Early indications are that it is likely that a combination of scenarios and additional growth components will best address the strategic objectives and meet national policy expectations, though the greater the growth the greater the challenge regarding cumulative impacts, infrastructure sufficiency and deliverability.
- 5.6 Outcomes from the scenario appraisal process have informed the formulation of three further growth options for review, drawing on the four scenarios and four additional components of growth, as well as scoping policy and other responses (e.g. relating to infrastructure interventions) to ensure eventual plan-led growth is clean and inclusive.
- 5.7 Further technical work is ongoing with respect to testing and further refining these growth options, notably in respect of deliverability and viability to arrive at and carry out final assessment of the preferred spatial strategy. These assessments will further inform policy drafting and the drafting of the Infrastructure and Investment Delivery Plan that will accompany the draft SDS.
- 5.8 Scenario and growth option appraisal continues to be informed by ongoing engagement with prescribed bodies, infrastructure providers and neighbouring authorities.

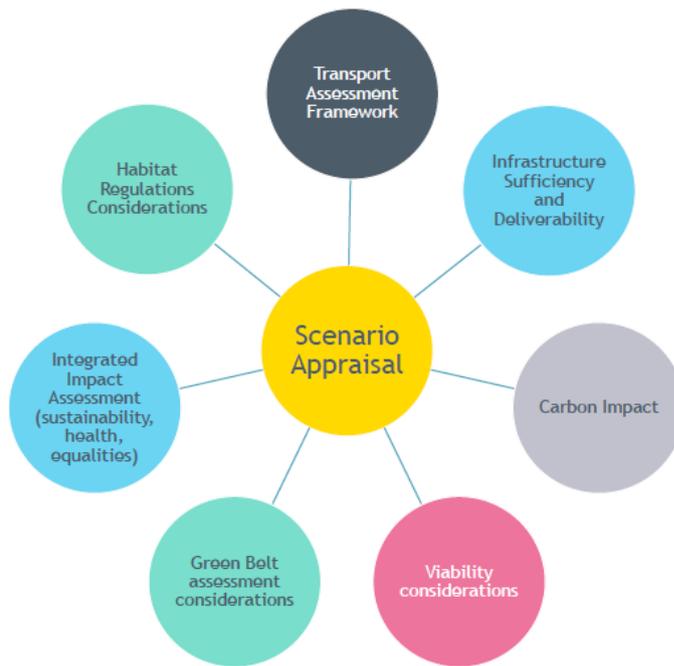


Figure 2: Spatial Scenario appraisal contributions

6. Update on strategic priorities and cross cutting issues (January 2022)

Clean and Inclusive

- 6.1 The overarching objective of the SDS is *Clean and Inclusive Recovery and Growth*. Version 2 of the Statement of Common Ground set out how the clean and inclusive growth principles have been developed for the SDS, including through public and stakeholder engagement.
- 6.2 The Combined Authority’s position on Clean and Inclusive recovery and growth is unchanged from September 2021.

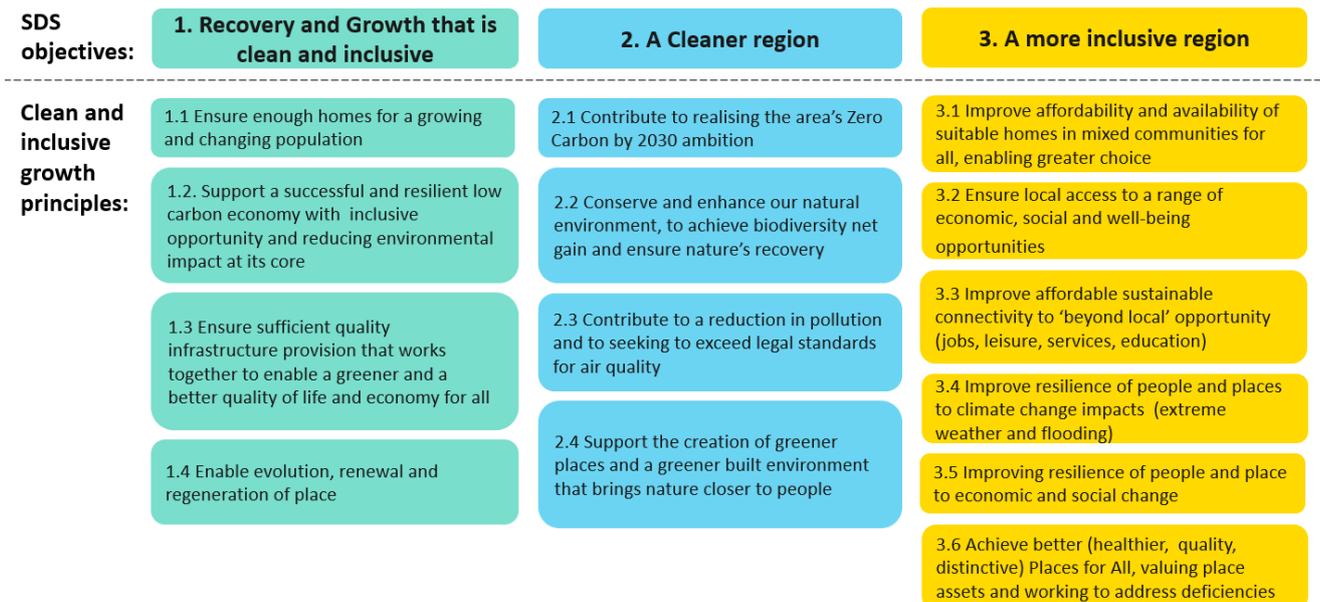


Figure 3: The SDS clean and inclusive growth principles

Box 1: Clean and inclusive recovery and growth

Clean and inclusive recovery and growth having regard to climate and ecological emergencies is at the heart of the area's strategic priorities for spatial planning. The clean and inclusive growth principles give further meaning to the strategic objectives by relating them to plan-making, identifying issues that planning can help tackle, and forming the framework for identifying and assessing spatial responses.

Carbon emissions and air quality

6.3 The SDS objectives and the clean and inclusive growth principles recognise the role of the SDS in contributing to realising the area's ambition to be zero carbon by 2030 and to reduce air pollution. Version 1 of the SoCG identified that the cross-boundary planning response to address carbon emissions and air quality arises largely from considering impacts of cross-boundary transport and energy networks, which are discussed separately below. Version 2 outlined how the SDS Integrated Impact Assessment (IIA) framework includes sustainability and climate change considerations.

6.4 Evidence outputs (as set out in Version 1 & 2 of the SoCG) have informed the SDS approach to contributing to zero carbon objectives, notably through scenario appraisal and climate change adaptation and resilience policy scoping. Evidence has been commissioned to inform the SDS net zero buildings policy and is published alongside this Statement of Common Ground⁶.

⁶ Available from: <https://www.westofengland-ca.gov.uk/what-we-do/planning-housing/spatial-development-strategy/>

- 6.5 The Combined Authority’s commitment to achieve net zero by 2030 has also been the subject of discussion with infrastructure providers. Utility providers in the region have recommended policy approaches that will deliver high levels of efficiency for water and energy use and robust building standards to ensure long term resource efficiency and reduced whole life carbon use. Water companies also highlighted that water efficiency measures will be a key component of household carbon reduction.
- 6.6 Engagement with utility providers is also informing the SDS policy approach to address energy demand and water efficiency. Water efficiency includes the use of Sustainable Drainage Systems (SuDS) and rainwater harvesting which contributes to resilient water supply and will be within the scope of strategic policy addressing climate change and the natural environment in the SDS.

Box 2: Carbon emissions and air quality

Outputs of the IIA, HRA, Carbon Impact Assessment, net zero building evidence, Costs of Carbon work and Renewable Energy Resource Assessment Study (RERAS) as well as wider infrastructure sufficiency assessment work are informing approaches to policy and spatial strategy to contribute to realising the area’s ambition to be zero carbon by 2030 and improving air quality.

Joint working with infrastructure providers is informing the policy approach of the SDS to maximise resource efficiency and reduce whole life carbon use.

Health inequality

- 6.7 Public Health partners have been engaged on an active and ongoing basis to inform the development of strategic policies that contribute to addressing health inequalities and wider determinants of health, including the built environment, active travel and access to green space and nature. This input is informing the development of SDS policies addressing Placemaking and the Natural Environment. Feedback from relevant health bodies has also fed in to the IIA assessment framework.
- 6.8 Engagement with public health partners and review of up to date health evidence has highlighted the key health risks and health inequalities in the region that the SDS may contribute to addressing, including those that have been exacerbated by the Covid-19 pandemic. This has also informed the policy approach, in particular the development of Placemaking policy for which addressing health and health inequalities is a key driver.
- 6.9 The above engagement has taken place through West of England Combined Authority attendance at the Public health Partnership Built Environment Group, the attendance of

health partners at the Strategic Planning Forum and also written feedback from health partners at appropriate plan-making milestones.

Box 3: Health inequality

Ongoing engagement with strategic health bodies has supported the identification of issues and opportunities for the SDS to contribute to tackling health inequalities. Engagement with health partners has informed the IIA framework and strategic policy development to ensure that the SDS responds appropriately to opportunities to address the wider determinants of health at this spatial level.

Housing including affordable housing, quantity and distribution

- 6.10 A Local Housing Needs Assessment (LHNA) to assess the nature and make-up of current and future housing needs across the area was published in October 2021, and a commentary on potential cross boundary issues arising is set out in Version 2 of the Statement of Common Ground.
- 6.11 The LHNA found that (based on the government’s standard methodology) the housing need over the 20-year period of the SDS for the West of England Combined Authority area is 105,120 dwellings. Of this, the affordable housing need is 34,646. The SDS housing requirement will take the need figure as a starting point and also consider capacity, the spatial strategy and deliverability. The figures will be revised with updated affordability data in the final version of the LHNA that will be published alongside the draft plan in 2022.
- 6.12 The housing need identified through the LHNA has provided a benchmark against which to develop spatial scenarios. Whilst the development of these spatial scenarios has strived to meet the needs identified for the plan area through the LHNA, the evidence base continues to suggest that the full level of need is unlikely to be met within the Combined Authority area.
- 6.13 The scenario appraisal has looked at the extent to which capacity is available in areas outside of Green Belt and in locations well served by public (and other forms of sustainable) transport. Evidence suggests that none of the core scenarios will meet the scale of need identified through the LHNA, and therefore a combination of the scenarios (including some Green Belt areas) is likely to be required.
- 6.14 In accordance with NPPF para 141(c), neighbouring authorities have been formally approached to confirm whether any of the Combined Authority’s housing need (including affordable housing) can be accommodated within neighbouring authority areas. Further

appraisal of growth options to establish a formal final position is underway. Neighbouring authorities have been approached to confirm whether any unmet need can be met cross boundary prior to considering the use of Green Belt or flood risk areas.

- 6.15 Initial discussions with neighbouring authorities have indicated that they are unlikely to be in a position to accommodate any unmet need arising from the Combined Authority area. This is due to the anticipated challenges to meet their own authorities housing need and known environmental and delivery constraints (as set out in Version 2 of the Statement of Common Ground).
- 6.16 North Somerset Council are preparing a Local Plan (2023-2038) and have written to the West of England Combined Authority, Bristol City Council and B&NES Council individually to provide an update on progress. North Somerset Council's Executive Committee endorsed a preferred spatial strategy in April 2021 and are preparing to consult on the draft Local Plan Preferred Options in spring 2022.
- 6.17 North Somerset Council have concluded that the potential deliverable capacity (outside the Green Belt) will deliver a quantum of housing that does not meet the local need figure for the plan period. In line with the NPPF (para 141) NSC has approached neighbouring authorities about whether they are able to accommodate any of the unmet need for development. The West of England Combined Authority has responded to NSC to confirm that initial technical analysis indicates that the region will be unable to meet the current government set LHNA figure within the SDS area and are consequently unable to accommodate any unmet need arising from North Somerset.

Strategic Housing Land Availability Assessment

- 6.18 The Combined Authority councils have worked to establish a consistent approach to assessing housing land availability across the housing market area, particularly in terms of the handling of constraints and density typologies. This work is ongoing. No broad locations for growth have been ruled out at this stage, but assessment of the impacts of constraints is being undertaken in more detail. This includes consideration of key constraints such as flood risk issues. The way that constraints are being factored in to the SHLAA assessment is set out in the SHLAA Methodology Statement⁷.
- 6.19 The approach to calculating urban capacity to ensure all authorities are maximising opportunities to make efficient use of land and focus growth opportunities in urban areas. The methodology has been discussed with North Somerset to ensure a consistent approach. The Combined Authority acknowledges that urban capacity in North Somerset is constrained and is satisfied that opportunities to seek growth in urban areas have been

⁷ Available from: <https://www.westofengland-ca.gov.uk/what-we-do/planning-housing/spatial-development-strategy/>

reasonably explored, and all sources of delivery with reasonable prospect of delivery have been identified.

Box 4: Housing

The LHNA for the West of England (based on the government's standard methodology) concludes that the housing need for the Combined Authority area over the 20-year period just preceding the SDS plan-period is 105,120 dwellings, of which the affordable housing need is 34,646⁸. This housing need figure provides a benchmark against which to develop and evaluate spatial scenarios.

Evidence and appraisal undertaken to date suggests that the West of England Combined Authority will not be able to accommodate the level of need identified through the LHNA within its boundaries. Neighbouring authorities have been approached to explore whether any of the Combined Authority's unmet need can be accommodated cross boundary prior to considering the use of Green Belt or flood risk areas.

Employment, including retail, leisure and other commercial development

- 6.20 An Employment Land Spatial Needs Assessment (ELSNA) was published in October 2021, and a commentary on the potential cross boundary issues arising was set out in Version 2 of the Statement of Common Ground.
- 6.21 Issues identified with potential cross boundary implications are those relating to the protection of employment land and the relationship with housing capacity; transport serving employment areas including surface access to the port and airport; the future of these economic assets (linked to national policy positions on airports and ports) and the identification of additional supply of employment land to meet qualitative needs.
- 6.22 The ELSNA study outputted employment land need figures for each of the four West of England authorities. These provide a starting point to be used in conjunction with qualitative considerations in considering the most appropriate spatial response to meet identified needs. This evidence will be used to inform discussions with North Somerset as it is also part of the Functional Economic Market Area.
- 6.23 Duty to Cooperate discussions with North Somerset Council as part of the development of its Local Plan have explored the potential for employment land to be allocated as part of any release of Green Belt should exceptional circumstances be identified. The potential cross-boundary implications will require further discussion as the North Somerset Local Plan progresses.

⁸ This will be re-calculated and re-based to 2042 when new data is made available in early 2022.

6.24 Discussions with Stroud District Council as part of the Duty to Cooperate arrangements between Stroud and South Gloucestershire have also highlighted the need for cross-boundary discussions to continue in relation to the Severn Edge project, which has the potential to create a strategic employment site at Oldbury in South Gloucestershire. Given the scale of the proposed project, there are a range of socio-economic, environmental and transport opportunities and implications which are being jointly explored and addressed by partners to the project. This is largely facilitated through the Western Gateway economic partnership.

Box 5: Employment

The ELSNA for the West of England Functional Economic Market Area (FEMA) has identified key issues and strategic recommendations for policy to address employment land supply need over the 20-year period of the SDS. This will inform ongoing discussions with neighbouring authorities with most significant functional economic relationships with the Combined Authority area.

Cross boundary issues, constraints and opportunities arising from strategic employment sites (such as the potential Severn Edge project) and employment land release close to authority boundaries will continue to be addressed through ongoing cross-boundary collaboration and working through regional partnerships.

Green Belt

6.25 Version 1 of the SoCG identified the role of the Green Belt and its spatial extent as a Duty to Co-operate issue, due to the boundaries of the Bristol and Bath Green Belt extending beyond the West of England Combined Authority boundary. Version 2 of the SoCG confirmed that a Green Belt assessment suitable to support the SDS is being prepared to identify broad variations in the role of land in relation to each of the five national Green Belt purposes, defining parcels of land with ratings and supporting text.

6.26 In March 2021 a method statement for the Green Belt assessment was prepared for consultation with the relevant prescribed bodies (Historic England, Natural England and Environment Agency) and local planning authorities adjacent to the Combined Authority area. This provided an opportunity for these stakeholders to review and comment on the proposed approach to the study prior to the assessment being undertaken.

6.27 Responses were received from:

- Historic England

- Natural England
- Environment Agency
- Gloucestershire County Council
- North Somerset Council
- Wiltshire Council

6.28 These responses have been considered and used to update the methodology for the study where appropriate. Whilst no significant amendments were considered to be necessary, some changes were made in response to feedback on the methodology including:

- All publicly available historic evidence taken into account on the setting and special character of each identified historic town (in response to feedback from Historic England)
- North Somerset Council has produced an updated Green Belt assessment for the North Somerset area. A review and summary of this will be included in the West of England Combined Authority area Green Belt assessment. North Somerset Council's comments have also led to clarifications around the definition of land at Avonmouth as part of the Bristol urban conurbation.
- Further clarifications on the methodology in response to comments received will be included in the final strategic Green Belt assessment report.

6.29 Consideration of how adjacent land within neighbouring authorities affects the performance of land within the Combined Authority area will be reflected in the assessment of individual parcels as well as forming part of scenario appraisal. Any cross-boundary impacts identified will be raised with neighbouring authorities as appropriate as part of Duty to Cooperate discussions.

Box 6: Green Belt

A Green Belt Assessment for the Combined Authority area is being undertaken to support wider work to test spatial scenarios. Feedback on the methodology from strategic bodies and neighbouring authorities has informed the approach and this will be documented in the Green Belt assessment.

Consideration of the consistency of outputs from other Bristol and Bath Green Belt authorities' assessments may be subject to further cross-boundary discussions.

A further assessment of potential harm of Green Belt release associated with scenarios and growth options will also be undertaken, and this will include consideration of any cross-boundary impacts which may be subject to further discussion with neighbouring authorities.

Development Quality

- 6.30 High quality places will be promoted through a Placemaking policy in the West of England Spatial Development Strategy (SDS).
- 6.31 The scope of the policy is not considered to raise specific cross-boundary issues, however engagement with key stakeholders (including public health bodies) to inform and support the policy development is ongoing.
- 6.32 This includes the use of design review to provide input in to Placemaking policy drafting. An informal policy review workshop involving expertise in urban design related fields took place in October 2021, and feedback will support the development of placemaking, natural environment and climate change policy for the SDS.

Box 7: Development Quality

Engagement with a range of stakeholders in late 2020 to develop the content for the West of England Placemaking Charter provides regional evidence to inform strategic policy to address development quality in the SDS. Ongoing joint working with key partners will inform the policy approach to key issues including addressing health inequalities and achieving sustainable and inclusive communities as well as local distinctiveness.

Infrastructure

- 6.33 An Infrastructure and Investment Delivery Plan (IIDP) is being prepared to provide the infrastructure evidence base for the SDS and set out the wider delivery plan to ensure an appropriately integrated approach to infrastructure across the Combined Authority area. An initial topic paper providing an overview of infrastructure constraints, issues and opportunities was published in October 2021⁹.
- 6.34 The IIDP is informed by regular engagement with infrastructure providers and strategic bodies to ensure it is up to date and reflects the most up to date infrastructure position across the SDS area.
- 6.35 Version 2 of the Statement of Common Ground set out how infrastructure evidence had identified baseline issues and constraints. Further work to analyse planned infrastructure interventions and investment and potential spatial opportunities relating to strategic growth informed the development of four sustainable transport-based scenarios. These are set out in the IIDP Topic Paper: Issues and Options.
- 6.36 Further engagement with infrastructure providers and commissioners continues to capture sufficiency and deliverability issues and opportunities relating to the four

⁹ Available from: <https://www.westofengland-ca.gov.uk/what-we-do/planning-housing/spatial-development-strategy/>

scenarios, additional components of growth and combinations of these. This feedback is captured below.

Transport & connectivity including digital, and international via port and airport

- 6.37 Version 1 of the Statement of Common Ground identified the strategic issues and cross boundary issues relating to transport and connectivity.
- 6.38 Version 2 provided a summary of baseline issues and constraints identified through initial collation of evidence (including through engagement with infrastructure providers and commissioners) and infrastructure investment/intervention-related opportunities that help address these. These are set out in more detail in the Infrastructure & Investment Delivery Plan Topic Paper: Issues & Opportunities (September 2021)¹⁰. The four core spatial scenarios outlined at paragraph 5.3 were informed by this evidence.
- 6.39 A Transport Assessment Framework (TAF) has been developed for the region by the Combined Authority. The accessibility analysis in the TAF has informed the spatial scenario appraisal and helped identify gaps that can be addressed to improve sustainable transport outcomes. It has also been used to review locations not considered as part of the scenarios to ensure it is reasonable to continue to exclude them. The analysis provides high-level understanding of accessibility across the region, and also how accessibility changes through future transport scenarios as potential new transport infrastructure interventions are introduced.
- 6.40 A combination of quantitative and qualitative analysis, including the TAF work, has been undertaken to determine whether existing and proposed (or plausible) infrastructure interventions have sufficiency¹¹ to help accommodate the anticipated growth arising from the development locations and contribute to broader SDS clean and inclusive strategic objectives. Other than the TAF work, the analysis is primarily qualitative, drawing on extensive engagement with infrastructure providers and commissioners and their experience of implementing similar interventions, and/or addressing growth impacts and infrastructure deficits more generally. The analysis also draws on information from strategy, strategic masterplanning and business case documents, and ongoing parallel work.
- 6.41 Ongoing work on the infrastructure evidence base¹² has helped identify cross-boundary transport and connectivity issues that may arise from (or be exacerbated by) the spatial

¹⁰ Available from: <https://www.westofengland-ca.gov.uk/what-we-do/planning-housing/spatial-development-strategy/>

¹¹ Infrastructure sufficiency is defined as an appropriate quality, nature, distribution, and quantum (capacity) of infrastructure, achieved through investment, management and locational and design decisions, (infrastructure interventions) that achieves desired outcomes, in this case, Clean and Inclusive Recovery and Growth

¹² Infrastructure & Investment Delivery Plan Topic Paper: Issues and Opportunities is part 1; other components include the Duty to Co-operate engagement documented in this Statement of Common Ground which will be reflected in further evidence base reports.

scenarios. The key issues arise largely from the scale of growth anticipated (on top of the existing constraints identified) and the challenges this presents to infrastructure capacity and resilience, and the likely need for demand management¹³. Potential cross-boundary issues have also been identified resulting from growth at the boundaries of the West of England Combined Authority (both within WECA and over the border in neighbouring authorities).

6.42 Analysis of transport infrastructure sufficiency¹⁴ (notably accessibility and capacity) has identified the following potential issues, relevant to the spatial scenarios, with potential to create strategic / cross-boundary impacts and management challenges:

- Growth at SW Bristol and in Central Bristol will be particularly impacted by cumulative impacts of traffic associated with corridors extending to North Somerset growth locations¹⁵ in the absence of significant modal shift.
- Capacity issues on the Strategic Road Network (including the M32, M4, M5, A36, A4 and A46 and relevant junctions and interchanges). This is due to significant levels of private vehicle use for local journeys and intra-regional cross boundary movements combining with wider strategic traffic movement including from South Wales, North Somerset, Wiltshire and Gloucestershire and beyond (notably during seasonal peaks). This is particularly relevant for additional growth being tested in Central Bristol, the north Bristol Fringe and A38 Corridor, and northern South Gloucestershire. Capacity issues on the SRN have the potential to adversely affect safety and reliability of journeys, including public transport services.
- Growth in Somer Valley would add to cumulative impacts already likely due to an allocation in the Mendip Local Plan (further detail below).
- Growth in northern South Gloucestershire would be close to the boundary with Stroud District/Gloucestershire County Council. A cross-boundary cycling and walking route from Charfield to Wotton-under-Edge to employment and other neighbouring facilities is being progressed. This could complement the proposed Charfield rail station and address some of the accessibility deficiencies that remain in this area. However, due to proximity to M5 J14, rail service frequency enhancements and other complementary interventions (e.g. demand management) are likely to be important to sufficiently reduce car use and avoid limiting the ability of the SRN to fulfil its primary purpose. Capacity and safety issues at M5 J14 are a cross boundary issue as they are affected by cumulative

¹³ Measures that work to reduce transport impacts, particularly on congested networks, by reducing the need to travel, encouraging re-timing of journeys, and making non-car modes more feasible and attractive through a combination of 'carrots' (e.g. better public transport provision) and 'sticks' (e.g. reduced car parking or parking charges).

¹⁴ See para 6.40

¹⁵ North Somerset Local Plan is also in preparation. See <https://www.n-somerset.gov.uk/my-services/planning-building-control/planning-policy/our-local-plan/local-plan-2038>

impacts of growth in the vicinity, including those identified in the (existing and draft) Stroud Local Plan.

The above impacts and challenges are being accounted for in scenario appraisal conclusions and subsequent work.

- 6.43 The cumulative transport impacts of growth across the region and in neighbouring authorities is a common theme. The impacts are likely to be focused on main road networks that act notably as commuter links between residential and employment areas. Growth would potentially generate additional impacts regardless of location, but growth may provide opportunities to improve sustainable transport infrastructure. Growth can also create a critical mass to make additional service provision viable. Infrastructure sufficiency analysis has also identified that the relative scale of growth in some locations would present a greater delivery challenge and potentially introduce a time lag to delivering development. In the short term, this may lead to additional pressure on existing facilities and/ or require longer journeys to reach facilities (including in some cases, cross boundary journeys).
- 6.44 Appropriate co-ordination across boundaries will therefore be required to maximise the effectiveness of planned transport investment and other interventions associated with the scenarios (see para 5.3) (including strategic corridor enhancements, Charfield rail station).
- 6.45 Early conclusions from the scenario appraisal sufficiency analysis highlight that demand management will be a key intervention to ensure transport infrastructure sufficiency. A variety of demand management measures will be required depending on what is already in place. The likely effectiveness of different measures will depend on location and road network layout. A cross boundary approach will be most effective to manage demand from new development, requiring joint working with neighbouring authorities and other partners.
- 6.46 Consideration of the spatial scenarios also raises potential deliverability challenges. Firstly, as planned levels of growth increase, the need for infrastructure investment and mitigations also increases. Secondly, the scale of growth under appraisal in the SDS spatial scenarios represent a significant uplift as compared to current levels of delivery. This could in itself present significant deliverability challenges including securing funding, viability of operation of required services and the scale of infrastructure required for some broad locations to come forward. Therefore, scenario one (based on committed infrastructure interventions) is the most deliverable, with scenarios 2, 3 and 4 becoming more challenging as the scale of required infrastructure interventions increases.
- 6.47 However, in October 2021, the government confirmed a £540 million investment for the West of England through the City Region Sustainable Transport Settlement (CRSTS)¹⁶ for

¹⁶ Available from: <https://www.westofengland-ca.gov.uk/wp-content/uploads/2021/10/West-of-England-Combined-Authority-CRSTS.pdf>

the period 2022-2026, with a further tranche anticipated in 2027 onwards. This equates to a step change in regional transport investment. The CRSTS incorporates a significant proportion of the corridor and central area based measures that the TAF analysis indicates would be required to provide broad locations for growth with suitable levels of sustainable transport accessibility. The CRSTS provides higher levels of certainty that sustainable transport interventions will be deliverable over the SDS plan period.

- 6.48 Bilateral discussions with internet providers have taken place and confirmed that digital connectivity is not anticipated as a barrier in any of the spatial scenarios, although there may be cost differences to connect different locations to full fibre.

National Highways

- 6.49 National Highways (previously Highways England) is the government company charged with operating, maintaining and improving England's Strategic Road Network (SRN). The SRN comprises motorways and certain major A roads. Its functions and duties are set out in the Infrastructure Act 2015. The Secretary of State for Transport set out directions and guidance for National Highways in the 2015 Licence. This outlines objectives for National Highways – including protecting and improving network safety, ensuring effective network operation, minimising environmental impacts and conforming to sustainable development principles.
- 6.50 The Road Investment Strategy defines the principal purpose of the Strategic Road Network. The principal purpose is to enable safe, reliable, predictable, rapid, often long distance, journeys of both people (whether as drivers or passengers) and goods in England between (i) main centres of population; (ii) major ports, airports and rail terminals; (iii) geographically peripheral regions of England; and (iv) chief cross-border routes to Scotland and Wales.
- 6.51 National Highways have been informed about the development of the transport evidence supporting the SDS and the Infrastructure & Investment Delivery Plan (IIDP) and continues to review emerging technical outputs. This is both as a member of the Strategic Planning Forum and through additional regular bilateral meetings and communications.
- 6.52 National Highways have raised concerns that significant additional growth in the SDS area would increase pressure on the SRN. This may in turn limit the ability of the SRN to fulfil its primary purpose. Particular concerns have been raised regarding junction capacity on the M5 (particularly in combination with seasonal peaks & cross boundary growth).
- 6.53 It is also noted that there is very limited national funding available to invest in significant junction upgrades and network capacity in the region beyond what has recently been delivered at the M49.

Box 8: Areas of agreement between the West of England Combined Authority, the constituent authorities and National Highways, January 2022

The following is common ground:

Travel patterns are influenced by a wide range of factors. Recent influences have included the removal of the tolls on the Severn Crossings (M4 and M48) and the Covid-19 pandemic (restrictions on travel, home working and greater levels of UK tourism). It is not yet clear what the long-term trends will be from these influences. Travel patterns are also influenced by congestion. Notwithstanding committed investment and changes in travel behaviour (current and future), there are anticipated to be a number of capacity and safety issues affecting the SRN. Journeys to and from development at the broad locations of growth identified in the Spatial Development Strategy will have a bearing on these issues.

Traffic flows are monitored by National Highways and will be shared with the West of England Combined Authority when available.

National Highways are preparing Route Strategies that will document the current and future challenges on the SRN, such as capacity and safety issues. The Strategies will set out recommendations for investment priorities. The Combined Authority will feed information into this process regarding the preferred spatial strategy and broad locations for growth as the plan progresses. Different Route Strategy priorities are likely to be set depending on the characteristics and function of the affected parts of the SRN.

Within the Combined Authority area National Highways is also currently undertaking or involved with other studies and workstreams focussed on particular problems. These comprise the Severn Tolls Resilience Study, M5 J14 model update, and studies in relation to M32 park and ride and corridor improvements. Schemes may emerge from these studies and workstreams. If funded and implemented, the schemes will influence travel patterns and traffic flows. Further discussions will be needed with partner organisations to identify the funding and delivery strategies, including policies in Local Plans.

The Combined Authority, constituent authorities and National Highways all support a spatial strategy and wider transport plans that minimise trip generation at source, encourage the use of sustainable modes of transport, minimise journey lengths and promotes accessibility for all. This contributes to environmental and carbon reduction objectives. It makes the most efficient use of limited available road capacity and reduces the potential for creating congestion on the Strategic Road Network.

The Combined Authority has developed and assessed growth scenarios for the Spatial Development Strategy based on current and likely future accessibility by sustainable transport. In broad terms, this spatial strategy approach should help the SRN to fulfil its primary purpose.

The Combined Authority has developed a Transport Assessment Framework (TAF) to provide evidence for the Spatial Development Strategy. The TAF analyses access to a key range of destinations within acceptable journey times, with greater weight given to sustainable travel accessibility. The analysis is based on the scope of available sustainable transport options across the Combined Authority area that are likely to influence travel behaviour, both now and with committed and potential investment in place. National Highways is content with the broad principles of the TAF in assessing current and future sustainable transport accessibility of potential locations for growth. Relevant outputs have been, and will continue to be, shared with National Highways.

The Combined Authority has also prepared data on baseline journey patterns and levels of congestion. This data has been used to indicate where additional travel demand from the broad locations for growth would be more likely to be problematic due to existing capacity issues on roads/links and junctions. This forms part of the sufficiency analysis. The TAF and qualitative analysis identifies that transport infrastructure sufficiency would be more difficult to achieve in growth areas where (i) capacity issues exist and (ii) demand management and additional sustainable transport interventions are likely to be less effective.

In line with DfT Circular 02/2013, highway capacity enhancement measures to the SRN will be considered after sustainable transport and demand management measures have been 'fully explored and applied'.

Accordingly, it is possible to identify some broad locations for growth in the scenarios which will be more challenging than others to deliver from a transport perspective. Some broad locations for growth will require a greater scale of interventions to support them in addition to sustainable transport measures. Analysis to date (that continues to be reviewed by National Highways) indicates that typically these are more peripheral locations, and/or those that are close to motorway junctions.

Next Steps

The desirability of continued bilateral discussion is agreed to help develop the SDS. This recognises the various objectives of both National Highways (as set out in the Infrastructure Act 2015) and the West of England authorities and the appropriate balance between them that will need to be resolved. It recognises that we are in a period of shifting policy priorities and travel behaviour. Any changes in adopted policy by National Highways and the Combined Authority can be reflected in subsequent iterations of Statements of Common Ground.

Current priority areas of collaboration (subject to ongoing review) in respect of the strategic issues set out here are:

- Route Strategies (including the setting of objectives)
- The M32 Studies

- Review of recommendations from the Seven Tolls Resilience Study
- The M5 J14 model update
- Ongoing work to achieve decarbonisation

National Highways will be provided with further supporting transport evidence about the broad locations for growth that form part of the preferred spatial strategy when it becomes available. During the SDS preparation period this transport evidence will be focussed on additional TAF and sufficiency analysis outputs relating to final spatial strategy and plan assumptions.

Each of the local planning authorities in the Combined Authority will prepare a Local Plan. These will allocate sites for development. The Local Plans will be in general conformity with the spatial strategy policy in the SDS.

Through the subsequent Infrastructure and Investment Delivery Plan (IIDP) and Local Plan processes, National Highways will work with the West of England authorities to (i) understand detailed transport impacts and (ii) identify additional network capacity enhancement and interventions that may be necessary and justified to address these. Consideration of suitability, viability and deliverability will form part of this process. The West of England authorities will take account of evidence from WERTM, other analysis and the views of consultees, including National Highways, in the development and ongoing progression of the IIDP and the wording of policies and site allocations in the Local Plans.

Stroud District Council and Gloucestershire County Council

- 6.54 Stroud District Council have prepared a Statement of Common Ground with South Gloucestershire to set out joint work on strategic matters that impact the Stroud Local Plan review (2020-2040), which was submitted for examination in Autumn 2021. This demonstrates that South Gloucestershire Council and Stroud District Council have engaged proactively and positively on strategic transport matters through the Duty to Cooperate.
- 6.55 The principal cross-boundary transport issue arising from the Stroud Local Plan is the need to manage the impact of proposed growth around Stroud on the transport network in a sustainable manner. In addition to those issues identified above, there is active discussion of the transport impacts arising from the potential development of the Fusion Technical Centre at Severn Edge (Oldbury power plant). This site has been shortlisted as a potential venue for the UK Atomic Energy Authority's first prototype fusion plant, and a bid taken forward through the Western Gateway¹⁷. Development would include an associated 'eco-system' of research and development, businesses and training facilities.

¹⁷ Information on the Western Gateway can be found at: <https://western-gateway.co.uk/>

- 6.56 The Stroud Local Plan SoCG confirms that parties agree to work together and with National Highways and developers to determine appropriate infrastructure interventions to address identified issues at M5 Junction 14. This will be taken forward in advance of hearing sessions on the Stroud Local Plan in 2022.

Mendip District Council

- 6.57 The allocation in the Mendip Local Plan of 455 homes at Midsomer Norton will require cross-boundary coordination to ensure that the cumulative impact on transport infrastructure is managed. This will need to be considered alongside the potential for further growth to come forward through the SDS (included in core scenario 2). The (modified after examination) Mendip Local Plan commits B&NES and Mendip to joint working:

Development proposals must assess and mitigate the potential cumulative transport impacts which may arise from committed development, both within Mendip District and Bath and North East Somerset, through undertaking a cross-boundary transport impact assessment.

- 6.58 Further to the growth allocated in the Mendip Local Plan, the potential for growth at Somer Valley within the B&NES boundary has also been identified as potentially more challenging to deliver strategic scale infrastructure change. This is because growth would likely come forward through small sites which individually are too small to justify the provision of new facilities, but cumulatively add up to significant additional infrastructure need.

Box 9: Transport and Connectivity

Initial findings from the infrastructure evidence base suggests the focus of strategic transport and connectivity investment yielding strategic growth opportunity compatible with the SDS strategic objectives during the SDS plan period will be focused within the Combined Authority area. Four sustainable transport led scenarios have been developed for scenario appraisal on this basis.

Scenario appraisal has identified potential cross-boundary transport issues arising from the four scenarios. These are largely related to capacity issues on the Strategic Road Network, potential cross-boundary impacts of growth at the boundary of the Combined Authority area (both within and adjacent to the SDS plan area), and the cumulative impact of growth across and beyond the West of England on the strategic transport network.

The Combined Authority has developed a Transport Assessment Framework to provide evidence for the SDS about access to a key range of destinations within acceptable journey times, prioritising sustainable travel modes. Relevant outputs have been, and will continue to be, shared with National Highways.

Opportunities to effectively reduce and manage potential impacts will continue to be discussed and progressed as appropriate with neighbouring authorities and National Highways, including sustainable transport and demand management interventions.

Current priority areas for collaboration have been agreed between the West of England Combined Authority and National Highways, and any updates will be reflected in subsequent iterations of the Statement of Common Ground.

Utilities – energy/water/sewerage/waste

- 6.59 Version 1 of the SoCG identified utility networks as a cross boundary issue due to the nature of connectivity networks and movement of utility services and waste across local authority boundaries.
- 6.60 Engagement with infrastructure providers and utilities companies has included discussion on the four SDS spatial scenarios. No significant constraints or cross boundary issues relating to utilities were raised through these discussions. No constraints considered as significant enough to challenge delivery of any of the spatial scenarios were identified, but useful understanding of infrastructure constraints that will need to be addressed to bring forward growth in some parts of the region have been highlighted. These will be set out in an Infrastructure sufficiency topic paper and considered through the IIDP and UA infrastructure delivery plans. The IIDP will also consider the deliverability challenges arising from cumulative impact of the scale of infrastructure delivery required to support the SDS.

Wessex Water

- 6.61 Engagement with Wessex Water has established that in principle sewerage and waste water treatment is unlikely to be a barrier to development due to treatment plants being upgraded when necessary, and potential constraints are likely to be overcome through forward planning as certainty of development is established.
- 6.62 Wessex Water have shared outcomes from their high-level sewerage capacity analysis and flagged constraints that may need to be addressed to support the delivery of the spatial scenarios discussed. These include:
- Potential for waste water constraints in the areas of Thornbury, North Bristol and around Keynsham. North Bristol has capacity for the levels of growth currently projected but further works may be required to facilitate any further development.
 - Waste water treatment plants may require upgrading in some parts of the region included in scenarios if they are identified for growth (this includes Saltford/Keynsham, Charfield, Redwick, and the Somer Valley).
 - Wessex Water are looking at options for connections within the Avonmouth-Sevenside Enterprise Zone (ASEA). Most commercial companies have private sewers.

6.63 Ongoing discussion with Wessex Water will continue to identify constraints that will need to be addressed as a preferred spatial strategy is developed.

Western Power Distribution

6.64 No issues have been raised by Western Power Distribution regarding the spatial scenarios and the scale of growth anticipated in the West of England. Although there are known 'pinch point' areas within the SDS area that may require upgrades to the electricity infrastructure at certain substations to accommodate future growth, this is not viewed as a barrier to future development. Any required upgrades to energy infrastructure would be undertaken when there is certainty and that development will come forward.

Wales & West Utilities

6.65 Discussion with Wales & West Utilities (WWU) has not identified any significant issues regarding spatial scenarios and the scale of growth anticipated in the West of England. One area of potential area of constraint is Charfield in North South Gloucestershire (in Scenario 3), where WWU indicate that supply constraints will need to be addressed. However, any upgrades to the gas terminal that may be required in north South Gloucestershire would be progressed as relative certainty of development is achieved and would be funded through W&W business plan with developer contributions as necessary. The gas infrastructure network is not considered a barrier to future development, and required upgrades will be made when required, based on a capacity basis.

Security/resilience Infrastructure including flooding

6.66 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 (EA). The UAs maintain their own flood risk assessments, but the EA oversees this, ensuring application of a consistent methodology and appropriate updates to reflect new catchment modelling and climate change scenarios.

6.67 Version 2 of the SOCG set out how evidence demonstrated that when taking into account climate change scenarios, existing flood defences are insufficient on the river Avon (especially in central Bristol) and at Severnside and may present significant barriers to future growth in some parts of the region if not resolved. The Environment Agency has also advised that strategic flood solutions are likely to be required for the River Frome and Bath & North East Somerset section of the River Avon in future, with early scoping and pilot work under discussion with relevant parties.

6.68 Appropriate and up to date evidence on flood risk is being used to inform the SDS. This includes:

- Local Authorities' Strategic Flood Risk Assessments
- Severn River Basin District Flood Risk Management Plan (Environment Agency)
- Bristol Avon Flood Strategy

The Environment Agency have also advised of the preparation of strategies for the River Frome and the Bath catchment of the River Avon. These strategies would identify the mitigations required to ensure that development is safe for its lifetime.

- 6.69 Bristol City Council has developed the Bristol Avon Flood Strategy with the Environment Agency and other partners to set out a long-term plan for managing flood risk from the River Avon to Bristol and its neighbouring communities. This strategy is essential to protect existing communities from increased risk of flooding, and to enable development in some central Bristol locations. Strategic mitigations are also outlined in the Bath and South Gloucestershire Local Flood Risk Management Strategies.
- 6.70 The mitigation measures set out in the Bristol Avon Flood Strategy are supported by the West of England authorities and the Environment Agency, and significant investment in flood defences and mitigation is earmarked for a range of schemes in the region. However, there is currently a funding shortfall of c. £128 million to deliver all mitigations set out in the Bristol Avon Flood Strategy. This investment is required to enable development in flood risk zone 2&3 areas in Bristol City Centre and South West Bristol.
- 6.71 Flood mitigation measures being delivered through the Avonmouth Severnside Ecology Mitigation and Flood Defence project are committed and under construction. This offers protection to accommodate non-residential growth in flood risk areas between Aust and Avonmouth including the Avonmouth Severnside Enterprise area. However, current proposed mitigations do not give enough confidence (100 years lifetime) to accommodate residential growth in this area. Therefore, further (as yet un-scoped) flood mitigations would be required to support residential growth in this flood zone which is particularly relevant for assessment of Scenario 4.
- 6.72 Due to the cross-boundary nature of rivers and their catchment areas, the management of flood risk is a cross-boundary issue. In the West of England Combined Authority area, the tidal nature of the River Avon in Bristol and into B&NES creates further need for cross boundary coordination as interventions may have cross -boundary implications.
- 6.73 The River Avon catchment within B&NES, including the areas of Keynsham, Saltford, and Bath City Centre and strategic flood risk along the River Frome are identified as cross-boundary issues requiring joint work between the Combined Authority UAs and the Environment Agency. The EA has confirmed that the River Frome and the River Avon in Bath and in the A4 corridor are also likely to require strategic flood risk solutions. These are less well developed in scope to date, albeit work is ongoing to identify flood mitigation measures for the B&NES Avon catchment and the river Frome. Masterplanning work (in B&NES) and various trial green infrastructure based projects in the Frome Catchment are also in progress.

Environment Agency (EA)

- 6.74 The Combined Authority have engaged with the Environment Agency to seek input to the spatial scenario appraisal. At this time, the EA have raised significant concerns regarding the scale of new homes proposed in Flood Zone 3a under scenario 1 (flood risk variant, and all subsequent scenarios that incorporate this), highlighting the hazardous flood depths projected to affect central Bristol over the lifetime of the development and the risk to life this entails. This is also the case in respect of a number of proposals being considered at application stage which the EA are currently objecting to where inadequate flood risk mitigation is proposed. It is very difficult to successfully mitigate sites in these locations without strategic infrastructure due to the extreme flood depths expected.
- 6.75 Without strategic flood risk infrastructure there is a risk to life from flooding in some parts of the SDS area. The flood risk and mitigations required to make these areas safe and enable development have been identified as a potentially significant deliverability constraint at least affecting phasing, due in part to the present sizeable funding gap for those mitigations. However, the national and regional policy impetus to prioritise urban and brownfield land, and the contribution of urban growth to wider sustainability objectives (notwithstanding the flood risk issue) are also key considerations to evaluate to help come to the most sustainable strategy for growth. In turn this will assist in the development a robust funding case to support the delivery of strategic flood risk management infrastructure required to facilitate new development.
- 6.76 The West of England Combined Authority and the constituent UAs consider that there is a reasonable prospect of delivery of the identified flood mitigation requirements within the 20 year plan period, due to the high level of development potential, which, notwithstanding flood risk considerations are in otherwise highly sustainable brownfield locations that are strongly supported by national policy, and accordingly a shared understanding of the need to progress these strategies locally and regionally.
- 6.77 However, the Environment Agency do not consider there is reasonable prospect of delivery for Bristol Avon Flood Strategy (BAFS) at this time. This is in part due to the sizeable funding gap for Phase 1 of the Strategy - circa £128 million. Furthermore, there is not yet any policy support in the Development Plan to help facilitate delivery.
- 6.78 As part of this process, and to better secure that reasonable prospect, the Combined Authority and constituent UAs seek to continue to work with all parties including the Environment Agency to progress the development of a funding strategy and move towards delivery, with the aim of securing appropriate central government funding as well as developer and local / regional contributions.
- 6.79 Whilst acknowledging the ongoing nature of discussions with the Environment Agency to address its significant concerns, the following areas of common ground and outstanding differences with steps to resolve them are agreed between the signatories to this Statement of Common Ground and the Environment Agency:

Box 10: Areas of agreement between the West of England Combined Authority, the constituent authorities and Environment Agency, January 2022

The Environment Agency have provided advice on the application of the sequential test and exception tests to the SDS areas of search, and *the following is common ground*:

- Given the scale of growth required for the SDS area, the SDS is likely to identify development capacity in locations where there is a risk of flooding and where mitigation would be required.
- The Sequential Test will need to be passed in respect of broad locations for growth significantly affected by flood risk at a level appropriate for a non-allocating strategic plan. The Agency will provide further input to this process, notably in respect of the requisite evidence base when this is available.
- In relation to central urban locations, the wider sustainability benefits to the community, and limited availability of comparable alternative sites are recognised, though will need to be formally demonstrated.
- Some progress has recently been made in relation to Central Bristol flood risk, as it has now been agreed that strategic defences are required and the preferred approach to manage flood risk will be accordingly, further developed over the next few years. This is an important step forward, although the overall process is still at an early stage.
- The measures set out in the Bristol Avon Flood Strategy, are recognised by all parties as appropriate mitigations (subject to further development of detailed options) that could enable residential development in flood risk areas of Central and central South West Bristol to meet the Exceptions Test in combination with further site-specific measures. These mitigations, should they be successfully be delivered, will ensure development is safe for its users for the development's lifetime and will not increase flood risk overall. Recognising the critical dependence of this on delivery, work is underway to jointly scope a funding strategy and delivery plan and the phasing of capacity at risk from flooding is being reviewed to ensure that it provides an adequate lead in time.
- Central Government 'Grant in Aid' funding, (administered by the EA) whilst a welcome part of the funding pot, is primarily focussed on protecting existing property/business at risk from funding. Other funding will need to be secured from a variety of sources to close the current £128 million funding gap.
- Joint working will need to be sustained, drawing in appropriate central government funding as well as developer and local / regional contributions to realise the Bristol Avon Flood Strategy. This ambition recognises that there are limitations and HM Treasury rules in respect of current 'Grant in Aid' funding in respect of facilitating new development and the already challenging viability picture of brownfield development, despite other aspects of national policy alignment.

- The Avonmouth Severnside Ecology Mitigation and Flood Defence project that is currently being delivered will ultimately provide 17km of flood mitigation along the Severn Estuary from Aust to Avonmouth. This will provide strategic flood risk infrastructure to better protect commercial development. It is acknowledged that the EA would not support residential development in this area as it will require greater (un-scoped) mitigations and significant residual risk will remain. This project is a useful template in respect of an incremental/phased delivery approach and is illustrative of a solution being found in partnership to a strategic scale issue, although it is not otherwise directly comparable with the BAFS.
- The approach to the consideration of green infrastructure programme areas as a spatial opportunity to deliver strategic solutions to environmental impact (including the implementation of SuDS) is recognised as an important contributor to flood risk management. Partnership working to further mitigate risk to new and existing development through the delivery of blue-green infrastructure (for example on the River Frome) will continue to be pursued.
- The desirability of continued discussion between the EA, the Combined Authority and UAs is agreed, with priority areas for collaboration and mutual resource focus being those detailed above due to their strategic significance.

Areas not yet agreed

Environment Agency position:

The Environment Agency cannot currently support the growth being directed by the SDS to locations at risk from flooding without it being satisfied there is a reasonable prospect of delivery of the appropriate flood risk management infrastructure (e.g. Bristol Avon Flood Strategy). The deliverability of strategic flood risk mitigation has yet to be adequately demonstrated and the EA do not agree that there is yet a reasonable prospect of delivery, in part because there is currently a large £128m funding gap.

The EA have set out 5 steps that need to be achieved by Bristol City Council before they can rely on the flood mitigation and the Agency can review its position on new development in areas at high risk of flooding. These steps include the approval of the Strategic Outline Case, as well as the development of a funding strategy, legal agreement, phasing/delivery plan and the adoption of suitable planning instruments to support delivery. Further progress is needed in respect of 4 of these steps for the Bristol Avon Flood Risk Strategy in order for the EA to support the SDS identifying Central and central South West Bristol areas affected by flood risk as a source of capacity upon which the plan will rely.

West of England Combined Authority & constituent authorities' position:

The role of the SDS is to identify broad locations for growth and not to allocate sites. The Combined Authority consider that a reasonable prospect of delivery of flood mitigation measures required to bring forward development in areas of Central and central SW Bristol in

flood zone 3a (proportionate for a strategic plan) can be demonstrated, and this level of certainty is appropriate for a 20 year plan. This is in the context of:

- The agreement of a broad approach to flood risk mitigation, including next steps to further progress this, in order to bring forward development in sustainable locations in Central Bristol.
- It is reasonable to expect that over a 20 year plan trajectory funding and delivery will be secured for locations that are not sequentially substitutable given their sustainability credentials and alignment with national policy, and this reasonable prospect will need to be demonstrated in more detail through the Local Plans
- Joint working is in train to pursue a funding strategy and secure overall deliverability of the Bristol Avon Flood Risk Strategy
- A similar partnership approach has resulted in a delivery of the ASEA flood risk and ecological mitigations following joint work to close the funding gap
- Further strategies are being prepared that will resolve flood risk issues (including ensuring deliverability) to a higher level of certainty through the constituent authorities' local plans; this will include further updates to SFRA's data to ensure detailed decisions about allocations are made on the best available information.

Next Steps to resolve areas of disagreement

- The CA will work with Bristol City Council, the EA and other relevant parties to progress the funding and delivery conversation as well as the formal evidence base necessary to underpin other aspects of the Sequential and Exceptions tests in respect of the broad quantum and distribution of growth to be set out in the SDS.
- This will include reviewing the applicability of the '5 steps' to a non-allocating strategic plan and how they can be linked to phasing considerations and their refinement over the plan's implementation period.
- It is noted that the IIDP (Infrastructure and Investment Delivery Plan) will be an important mechanism during the implementation period for keeping track of these dependencies and ensuring plan (including Local Plan) and trajectory assumptions are as up to date as possible, with any reviews triggered as appropriate. A key objective of the IIDP is to ensure joint 'ownership' of infrastructure delivery challenges, with maximum benefit to be gained from concerted focus of resources from all relevant parties.

Social Infrastructure – health, cultural and educational facilities of sub-regional significance

- 6.80 Version 2 of the SOCG confirmed that education provision across the Combined Authority area has capacity issues due to population growth. Primary and secondary schools throughout the SDS area are generally at or close to capacity.
- 6.81 As the SDS is a strategic document, it does not set out requirements for future education infrastructure. It is assumed that proposed large-scale developments would financially contribute to social infrastructure as a requirement of their planning permission. Health provision is in a similar situation.
- 6.82 Infrastructure sufficiency analysis has identified that education and health infrastructure across the SDS area are close to capacity, and existing services would be unable to accommodate increased demand resulting from large scale growth in the absence of further investment, including in some cases, new facilities. The mechanisms to secure the required social infrastructure improvements resulting from new growth will come forward through Local Plans, which will consider in more detail the needs arising from growth proposals. The above constraints have potential to cause cross-boundary impacts. Cross boundary co-ordination in some places (where growth will be close to authority boundaries) will be important to help determine the optimal place and funding strategy for new education and health infrastructure. This will also consider the need to locate facilities close to good public transport provision and the potential cross boundary implications of trips generated by education facilities (acknowledging larger catchments for post-16 and specialist provision such as SEND).
- 6.83 Social infrastructure is also impacted by the challenge of cumulative small site development and the need to co-ordinate delivery of facilities that address needs arising across boundaries. As smaller developments individually are beneath the threshold to financially contribute to social infrastructure, this may contribute cumulatively to an increased strain on services, as may also be the case if insufficient cross boundary cumulative impact assessment. On a cross boundary basis, this requires particular attention in SW Bristol Somer Valley, as well as co-ordinating need more generally across the boundary in North South Gloucestershire.

Box 11: Utilities, security and resilience and social infrastructure

Flood risk mitigations to enable development in some parts of the SDS area, including sustainable urban central locations, have been identified as a potentially significant deliverability constraint. The Combined Authority seek to continue to work with all parties to progress a funding strategy and move towards delivery, drawing in appropriate central government funding as well as developer and local / regional contributions.

The West of England Combined Authority and its constituent councils will continue to work together and with other infrastructure providers and commissioners to identify and address infrastructure sufficiency issues relating to spatial strategy scenarios, making best use of the opportunities arising from the SDS to address identified constraints in utilities, security and resilience and social infrastructure.

Green Infrastructure (GI)

- 6.84 Green infrastructure deficiencies and opportunities will be responded to strategically in the SDS, developing the approach set within the West of England Joint Green Infrastructure Strategy (JGIS)¹⁸.
- 6.85 Version 2 of the West of England Combined Authority SoCG highlighted key issues identified through initial evidence review including increased pressure on existing green infrastructure assets from growing population, and the lack of a standard approach to delivering GI within the regional planning framework.
- 6.86 The approach to Green Infrastructure in the SDS builds on a long legacy of partnership working including with local authorities, the West of England Nature Partnership (WENP), Natural England, Environment Agency, infrastructure providers and the Bristol Avon Catchment Partnership (BACP). WENP and BACP brings together a broad range of statutory, voluntary and private sector partners, and provide representation to these bodies through their partnership working with the Combined Authority.
- 6.87 The Environment Officer Steering Group (EOSG) and the supporting Green Infrastructure Working Group ensures that key organisations and technical expertise within the West of England are brought together including officers from the Combined Authority, local authorities, WENP, BACP, Environment Agency and Natural England. The group meet monthly to provide a forum for monitoring and delivery of the West of England Joint Green Infrastructure Strategy (JGIS) and to share cross portfolio information and facilitate cross collaboration and best practice. The group also work to ensure the region can respond effectively to deliver the requirements of the DEFRA 25 Year Environment Plan and the Environment Act (2021).
- 6.88 This partnership has been central to the development of a strong evidence base and strategic commitment to Green Infrastructure management and enhancement through projects including:
- The West of England Joint Green Infrastructure Strategy, Action Plan and Annual Review

¹⁸ <https://www.westofengland-ca.gov.uk/west-of-england-joint-green-infrastructure-strategy/>

- The West of England Nature Recovery Network
- The Forest of Avon Plan: A Tree and Woodland Strategy for the West of England
- The Bristol Avon Catchment Plan

- 6.89 Across the plan area partners are working to identify and deliver a range of nature-based GI projects within priority programme areas. Regional Green Infrastructure Programme areas promote key opportunities for investment at a strategic level to ensure growth contributes to enhancing the strategic GI network and best realises multifunctional GI solutions.
- 6.90 The Combined Authority and Unitary Authorities work closely with water utilities providers as well key partners including the BACP to understand a catchment-based approach to the water environment. This approach is endorsed nationally and effective in addressing risks from an accelerated climate change.
- 6.91 The Bristol Avon Catchment Plan¹⁹ (and subsequent updates) helps to understand the impacts of future growth and opportunities to improve the ecological status of water bodies as required through the Water Framework Directive. The Combined Authority and Local Authorities will ensure ongoing engagement with water utilities providers and key partnerships including the Bristol Avon Catchment Partnership to address the impacts of future growth on water quality and quantity.
- 6.92 The spatial scenario appraisal accounts for green infrastructure assets through the consideration of key constraints (including protected habitats, landscapes, green assets and designations). Green infrastructure has also been considered as an opportunity in the appraisal of spatial scenarios. GI programme areas (based on the Nature Recovery Network) have been mapped to highlight opportunities to maximise nature's recovery and enhancing the connectivity of the NRN. The Nature Recovery Network has also been considered through the IIA and HRA assessments. Much of the evidence to establish these constraints and opportunities has been developed jointly through the partnership approach outlined above.
- 6.93 To consider the approach to Biodiversity Net Gain (BNG) across the West of England a working group, led by Natural England, has been established to develop a regional approach to guidance, policy, resource and implementation. The 'West of England Biodiversity Net Gain (BNG) guidance document' is being developed by WSP in collaboration with the working group and sets out the overarching considerations for BNG delivery, including identifying 10 key principles.

¹⁹ Available from: <https://www.wessexwater.co.uk/environment/catchment-partnerships/bristol-avon-catchment-partnership>

- 6.94 A key principle for delivering BNG will be understanding areas of strategic significance, where strategic approaches to offsetting can be developed. Work will continue through the development of Local Nature Recovery Strategies to explore the role of the NRN in informing BNG offsetting.
- 6.95 To further support the evidence base for the identification of green infrastructure opportunities, the West of England Combined Authority has commissioned the production of Green Infrastructure Area Profiles for the SDS area. These will identify key environmental, landscape, and historic assets and bring together information to set green infrastructure issues and opportunities within the profile areas. These will be informed by engagement from stakeholders to ensure a comprehensive baseline of projects and opportunities is brought together.

Integrated Impact Assessment

- 6.96 The SDS has a requirement to report on the reasonable alternatives that have been considered during the process of preparing the spatial strategy. The Integrated Impact Appraisal (IIA) is the vehicle for this requirement and provides a key input to the spatial scenario appraisal. The IIA tests the likelihood of 18 different types of social, economic and environmental impacts (positive and negative) from the proposed distribution of development. It does this through the application of decision aiding questions to guide the assessment of the four core spatial scenarios and their three variations (flood risk, green belt and additional development locations).
- 6.97 The IIA scoping report (which sets out the IIA methodology and assessment framework) was subject to consultation at the end of 2020 with a range of stakeholders, including those required under legislation (Environment Agency, Natural England and Historic England) and those considered as good practice to engage due to the need to consider effects on population (such as public health).
- 6.98 Responses to the IIA methodology consultation were received from:
- Natural England
 - Environment Agency
 - Historic England
 - West of England Public Health Partnership Built Environment Group
 - West of England Nature Partnership
 - Bristol Water
- 6.99 Responses from the above consultees were taken on board and used to update the assessment framework. The responses led to additional decision aiding questions being added to the assessment framework to cover:
- Protection and enhancement of blue infrastructure

- Connection of people to nature
- Promotion of enhanced placemaking
- Contribution of natural environment to the economy

Habitat Regulations Assessment

6.100 A Habitat Regulations Assessment (HRA) for the SDS is required by law, as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (2019). The assessment explores the impact of plans and projects on international sites including:

- Special Areas of Conservation (SAC)
- Special Protection Areas (SPA)
- Wetlands of International Importance (known as RAMSAR sites)

The HRA scoping report²⁰ sets out the approach to the HRA for the SDS, prior to the HRA being undertaken.

6.101 The HRA Scoping report was informed by an engagement workshop that took place on 25 November 2020 with a range of stakeholders, including North Somerset Council, Natural England, the Environment Agency, Bristol Avon Catchment Partnership (BACP), West of England Nature Partnership (WENP), and Avon Wildlife Trust. A draft version of the scoping report was shared with stakeholders and responses were fed into the final version which was published in October 2021²¹.

6.102 Input from the above stakeholders has helped identify key likely affects that were captured in the screening report and has supported a joint approach to ensuring most up to date evidence and understanding of environmental vulnerabilities affecting designated sites has informed the HRA methodology. Further joint working will continue to inform the screening process to ensure a shared understanding of potential impacts and any mitigations that may be identified.

6.103 HRA considerations have been taken on board as part of the spatial scenario appraisal, and these in turn will feed in to the HRA screening process. This helps identify the likelihood of the different spatial scenarios having potential harmful impacts on protected habitats and species due to the proximity and broad scale of possible development. This has begun to identify at a high level possible strategic impacts that may require consideration and mitigation.

²⁰ Available from: <https://www.westofengland-ca.gov.uk/what-we-do/planning-housing/spatial-development-strategy/>

²¹ Available from: <https://www.westofengland-ca.gov.uk/what-we-do/planning-housing/spatial-development-strategy/>

6.104 This includes the impact of further growth on the Severn Estuary, which is a Special Area of Conservation (SAC) a Special Protection Area (SPA) and Ramsar site. Potential impacts on the Severn Estuary from development is also highlighted as a cross-boundary issue in the Statement of Common Ground between South Gloucestershire and Stroud District Council for the Stroud Local Plan²². The key concern regards the cumulative impact of development along the Severn Estuary, including increasing recreational pressures. The cross-boundary nature of the estuary coastline allows for joint working opportunities to develop future mitigation strategies, for example through the Severn Estuary Partnership and the Severn Estuary Coastal Group. The scoping report and agreed impact buffers has informed an HRA focussed review of the scenarios.

Sub-regional economic, place-making and ecological assets

Natural environment

- 6.105 The Combined Authority councils jointly commissioned an update to their regional habitat mapping, with a focus on 'Priority Habitats' data, to maintain a consistent understanding of the spatial extent of the most important habitats and their sensitivity to change. This mapping has been developed working with North Somerset. The mapping will support future updates to the West of England Nature Recovery Network mapping undertaken by the local Nature Partnership (WENP) and other work through the JGIS (see above) which will highlight where there may be opportunities to enhance resilience and secure net gain, responding to the Environment Bill as necessary.
- 6.106 Landscape sensitivity assessments (in relation to wind and solar PV) are also being undertaken as part of the Renewable Energy Resource Assessment Study (RERAS). Preliminary findings of this study are being used to support the proposed policy approach in the Bath & North East Somerset (B&NES) Local Plan Partial Update.
- 6.107 Duty to Cooperate discussions between B&NES and Mendip District Council highlighted that similar work is being undertaken in Mendip. Both parties have noted that the outputs of these studies should be shared once complete to review any inter-relationships and understand whether any cross-boundary implications arise.

Historic Environment

- 6.108 As identified in Version 1 of the SoCG, historic, cultural and landscape features may have cross-boundary significance and some historic sites including the World Heritage Site of the City of Bath are of strategic significance. The historic environment also supports the

²² See Stroud Local Plan Review Duty to Cooperate paper. Available from: <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review/local-plan-examination/examination-library>

domestic and foreign visitor markets which have been identified as a key sector through the ELSNA study.

- 6.109 The historic environment is a key consideration of the strategic evidence base of the SDS that informs the spatial scenario appraisal and the development of policies for the SDS. These continue to be shared with Historic England at appropriate milestones.

Box 12: Green Infrastructure & Natural and Historic Environmental Assets

The West of England 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. Partnership work to deliver the JGIS Action Plan and review and add to JGIS evidence is ongoing, including agreement from Combined Authority councils to embed the principles of the JGIS into Local Plans and support its consistent application in plan-making, particularly in light of the Environment Bill. Engagement with partners has continued to shape SDS workstreams and assessments including the IIA and HRA.

The West of England Authorities continue to work across boundaries to consistently assess and manage direct and indirect development impacts (including opportunities for enhancement) on natural and historic environmental assets and their setting, including building a resilient and robust Nature Recovery Network, and factoring in appropriate constraints considerations to development capacity analysis and IIA work.

Issues that are identified through these assessments with the potential for cross-boundary issues (including impacts arising from growth on the Severn Estuary) are being discussed with key partners and neighbouring authorities as appropriate to ensure the policy framework and implementation of it incorporates and delivers suitable mitigations.

Minerals

- 6.110 The West of England UAs as Minerals Planning Authorities work together to produce a joint Local Aggregates Assessment and co-operate in and through the wider South West Aggregates Working Party structure.
- 6.111 In the West of England region, South Gloucestershire Council and North Somerset Council have land-won aggregate production operations within their authority boundaries. Although (as suggested in Version 2 of the SoCG) no cross-boundary issues have been identified to the scope of the Spatial Development Strategy relating to minerals, permitted reserves and landbanks, it is noted that continued joint working between South Gloucestershire Council and North Somerset Council will inform Local Plan minerals policies as part of duty to cooperate discussions.

Box 13: Minerals

The West of England Minerals Planning Authorities have agreed to 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.

South Gloucestershire Council and North Somerset Council will work jointly as part of their duty to cooperate obligations to inform Local Plan minerals policies.

7. Timetable for Review and Update

- 7.1 This Statement of Common Ground will evolve as plan-making progresses. It will be regularly reviewed and updated as agreement is reached on particular issues, acknowledging that signatories may change at different stages and according to the issues in focus. Key SDS gateway decisions
- 7.2 The SoCG will be re-published and updated as necessary to reflect gateway decisions for SDS plan-making, namely its inception, and the consultation draft and if necessary, any modifications.
- 7.3 It is anticipated that the next update to the Statement of Common Ground will be published alongside the draft (for consultation) SDS in Spring 2022.

Other review dates

- 7.4 Discussions with neighbouring authorities regarding unmet need, (if any arises/has arisen elsewhere) will continue as plan making progresses.
- 7.5 Local Plan consultation stages for the Combined Authority area councils will also fall between (and beyond) these dates and so the SoCG will also be published as necessary alongside these. The SoCG will be finalised for the SDS on its submission for examination, but will also be taken forward by each of the constituent UAs into their Local Plan pre-submission processes.

Next Steps

- 7.6 The West of England Combined Authority will approach neighbouring authorities to discuss unmet need arising from the SDS area. Neighbouring authorities' position in relation to meeting any unmet need will be recorded and documented in the next iteration of the Statement of Common Ground.
- 7.7 A further round of bilateral and smaller group discussions under the umbrella of the Strategic Planning Forum will include discussions on the preferred spatial strategy and any further issues arising from the evidence base as documented above.

Appendix 1: Agreements reached on strategic matters in the West of England Combined Authority area Statement of Common Ground Versions 1, 2 and 3

Strategic matter	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)	Agreement reached in SoCG Version 3 (January 2022)
Clean and Inclusive	<i>The West of England Authorities recognise the value in agreeing high level shared objectives in shaping investment and other decisions. It has been agreed that clean and inclusive recovery and growth having regard to climate and ecological emergencies will be at the heart of the area’s strategic priorities for spatial planning and the UN Sustainable Development Goals will also be important reference points to help achieve a better and more sustainable future for all.</i>	<i>Clean and inclusive recovery and growth having regard to climate and ecological emergencies is at the heart of the area’s strategic priorities for spatial planning. The clean and inclusive growth principles give further meaning to the strategic objectives by relating them to plan-making, identifying issues that planning can help tackle, and forming the framework for identifying and assessing spatial responses.</i>	<i>Clean and inclusive recovery and growth having regard to climate and ecological emergencies is at the heart of the area’s strategic priorities for spatial planning. The clean and inclusive growth principles give further meaning to the strategic objectives by relating them to plan-making, identifying issues that planning can help tackle, and forming the framework for identifying and assessing spatial responses</i>
Carbon emissions and air quality	<i>The West of England 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.</i>	<i>Outputs of the IIA, HRA, Carbon Impact Assessment, Costs of Carbon work and RERAS as well as wider infrastructure sufficiency assessment work will inform approaches to policy and spatial strategy to contribute to realising the area’s ambition to be zero carbon by 2030, and improving air quality.</i>	<i>Outputs of the IIA, HRA, Carbon Impact Assessment, net zero building evidence, Costs of Carbon work and Renewable Energy Resource Assessment Study (RERAS) as well as wider infrastructure sufficiency assessment work are informing approaches to policy and spatial strategy to contribute to realising the area’s ambition to be zero carbon by 2030 and improving air quality.</i>

Strategic matter	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)	Agreement reached in SoCG Version 3 (January 2022)
			<i>Joint working with infrastructure providers is informing the policy approach of the SDS to maximise resource efficiency and reduce whole life carbon use.</i>
Health inequality	<i>The West of England 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.</i>	<i>Ongoing engagement with strategic health bodies will continue to identify issues and opportunities for the SDS to contribute to tackling health inequalities, recognising that the wider determinants of health are influenced at this spatial level.</i>	<i>Ongoing engagement with strategic health bodies has supported the identification of issues and opportunities for the SDS to contribute to tackling health inequalities. Engagement with health partners has informed the IIA framework and strategic policy development to ensure that the SDS responds appropriately to opportunities to address the wider determinants of health at this spatial level.</i>
Housing including affordable housing, quantity and distribution	<i>The West of England authorities have agreed to work collaboratively on preparing a LHNA for the Combined Authority Area and North Somerset to identify the quantitative and qualitative housing needs of the sub-region, including Affordable Housing</i>	<i>The LHNA for the West of England (based on the government’s standard methodology) concludes that the housing need for the Combined Authority area over the 20-year period of the SDS is 105,120 dwellings, of which the affordable housing need is 34,646. This housing need figure provides a benchmark against which to develop and evaluate spatial scenarios. This work will be undertaken with input from ongoing</i>	<i>The LHNA for the West of England (based on the government’s standard methodology) concludes that the housing need for the Combined Authority area over the 20-year period just preceding the SDS plan-period is 105,120 dwellings, of which the affordable housing need is 34,646²³. This housing need figure provides a benchmark against which to develop and evaluate spatial scenarios.</i>

²³ This will be re-calculated and re-based to 2042 when new data is made available in early 2022.

Strategic matter	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)	Agreement reached in SoCG Version 3 (January 2022)
	<p><i>The West of England authorities have also agreed to work jointly on housing land availability to ensure that they have a clear and consistent understanding of the potential housing land available in the sub-region</i></p>	<p><i>capacity assessments through the SHLAA which is a key mechanism for exploring constraints. In turn, this work will inform ongoing discussions with neighbouring authorities regarding accommodating any unmet need arising from the Combined Authority area, and consistency of capacity assessment assumptions insofar as is appropriate.</i></p>	<p><i>Evidence and appraisal undertaken to date suggests that the West of England Combined Authority will not be able to accommodate the level of need identified through the LHNA within its boundaries. Neighbouring authorities have been approached to explore whether any of the Combined Authority's unmet need can be accommodated cross boundary prior to considering the use of Green Belt or flood risk areas.</i></p>
<p>Employment, including retail, leisure and other commercial development.</p>	<p><i>The West of England authorities agree to work collaboratively on a shared employment spatial needs evidence base covering the West of England FEMA, with clean and inclusive post-Covid 19 recovery and growth and at its heart. This evidence base will have a broad scope covering the needs of the office, industry and warehousing sectors at a high level, together with consideration of retail and waste and the role and potential future roles of infrastructure (including digital networks, the port and airport) in the functioning of the economy</i></p>	<p><i>The ELSNA for the West of England FEMA has identified key issues and strategic recommendations for policy to address employment land supply need over the 20-year period of the SDS. It has identified a need to better protect and intensify existing office, industry and warehousing areas and diversify away from an over dependence on Avonmouth/Severnside, recognising that some sectors will continue to have urban land needs, and the desirability of bringing forward additional land supply. This will inform ongoing discussions with neighbouring authorities with most significant functional economic relationships with the Combined Authority area.</i></p>	<p><i>The ELSNA for the West of England Functional Economic Market Area (FEMA) has identified key issues and strategic recommendations for policy to address employment land supply need over the 20-year period of the SDS. This will inform ongoing discussions with neighbouring authorities with most significant functional economic relationships with the Combined Authority area.</i></p> <p><i>Cross boundary issues, constraints and opportunities arising from strategic employment sites (such as the potential Severn Edge project) and employment land release close to authority boundaries will continue to be addressed through ongoing</i></p>

Strategic matter	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)	Agreement reached in SoCG Version 3 (January 2022)
			<i>cross-boundary collaboration and working through regional partnerships.</i>
Green Belt	<i>The West of England authorities will take a co-ordinated approach in the consideration of the Bristol-Bath Green Belt in the formulation of strategic planning policies</i>	<i>The Combined Authority councils are undertaking a Green Belt Assessment which will support wider work to test spatial scenarios. Discussions with neighbouring authorities may be required to support consideration of the role of adjacent land outside the Combined Authority boundaries. Consideration of the consistency of outputs from other Bristol and Bath Green Belt authorities' assessments will be required and may be subject to further cross-boundary discussions.</i>	<p><i>A Green Belt Assessment for the Combined Authority area is being undertaken to support wider work to test spatial scenarios. Feedback on the methodology from strategic bodies and neighbouring authorities has informed the approach and this will be documented in the Green Belt assessment.</i></p> <p><i>Consideration of the consistency of outputs from other Bristol and Bath Green Belt authorities' assessments may be subject to further cross-boundary discussions.</i></p> <p><i>A further assessment of potential harm of Green Belt release associated with scenarios and growth options will also be undertaken, and this will include consideration of any cross-boundary impacts which may be subject to further discussion with neighbouring authorities.</i></p>
Development quality	<i>The West of England Authorities recognise the value in working together to improve the quality of development, set high aspirations for place shaping and provide a</i>	<i>Engagement with a range of stakeholders in late 2020 to develop the content for the West of England Placemaking Charter provides up to date evidence to inform the scope of strategic policy to address</i>	<i>Engagement with a range of stakeholders in late 2020 to develop the content for the West of England Placemaking Charter provides regional evidence to inform strategic policy to address development</i>

Strategic matter	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)	Agreement reached in SoCG Version 3 (January 2022)
	<p><i>consistent approach to engaging with developers to ensure new development contributes to achieving sustainable and inclusive communities as well as local distinctiveness</i></p>	<p><i>development quality in the SDS. Ongoing joint working with key partners will inform the policy approach to key issues including addressing health inequalities and achieving sustainable and inclusive communities as well as local distinctiveness.</i></p>	<p><i>quality in the SDS. Ongoing joint working with key partners will inform the policy approach to key issues including addressing health inequalities and achieving sustainable and inclusive communities as well as local distinctiveness.</i></p>
<p>Transport & connectivity including digital, and international via port and airport</p>	<p><i>The West of England authorities recognise the value in co-ordinating transport and spatial planning across their area, and that 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. A new sub-regional transport model and associated Combined Authority area appraisal framework will be an important part to this work, as well as other more focussed cross-boundary and inter-authority studies</i></p>	<p><i>Initial findings from the infrastructure evidence base suggests the focus of strategic transport and connectivity investment yielding strategic growth opportunity compatible with the SDS strategic objectives during the SDS plan period will be focused within the Combined Authority area. 4 core scenarios have been developed on this basis. Cross boundary and infrastructure investment, deliverability and management implications arising from spatial scenarios and these and other relevant strategic infrastructure interventions will be considered through the scenario testing process.</i></p>	<p><i>Initial findings from the infrastructure evidence base suggests the focus of strategic transport and connectivity investment yielding strategic growth opportunity compatible with the SDS strategic objectives during the SDS plan period will be focused within the Combined Authority area. Four sustainable transport led scenarios have been developed for scenario appraisal on this basis.</i></p> <p><i>Scenario appraisal has identified potential cross-boundary transport issues arising from the four scenarios. These are largely related to capacity issues on the Strategic Road Network, potential cross-boundary impacts of growth at the boundary of the Combined Authority area (both within and adjacent to the SDS plan area), and the cumulative impact of growth across and beyond the</i></p>

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			<p><i>West of England on the strategic transport network.</i></p> <p><i>The Combined Authority has developed a Transport Assessment Framework to provide evidence for the SDS about access to a key range of destinations within acceptable journey times, prioritising sustainable travel modes. Relevant outputs have been, and will continue to be, shared with National Highways.</i></p> <p><i>Opportunities to effectively reduce and manage potential impacts will continue to be discussed and progressed as appropriate with neighbouring authorities and National Highways, including sustainable transport and demand management interventions.</i></p> <p><i>Current priority areas for collaboration have been agreed between the West of England Combined Authority and National Highways, and any updates will be reflected in subsequent iterations of the Statement of Common Ground.</i></p>
Utilities Security and Resilience and	<i>West of England authorities recognise the importance of working together and with other infrastructure</i>	<i>The West of England Combined Authority and its constituent councils will continue to work together and with other infrastructure</i>	<i>Flood risk mitigations to enable development in some parts of the SDS area, including sustainable urban central</i>

Strategic matter	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)	Agreement reached in SoCG Version 3 (January 2022)
Social Infrastructure	<i>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</i>	<i>providers and commissioners to identify and address infrastructure sufficiency issues relating to spatial strategy scenarios, making best use of the opportunities arising from the SDS to address identified constraints in utilities, security and resilience and social infrastructure. In the case of flood risk, this will include agreeing the approach to the sequential and exceptions tests.</i>	<i>locations, have been identified as a potentially significant deliverability constraint. The Combined Authority seek to continue to work with all parties to progress a funding strategy and move towards delivery, drawing in appropriate central government funding as well as developer and local / regional contributions.</i> <i>The West of England Combined Authority and its constituent councils will continue to work together and with other infrastructure providers and commissioners to identify and address infrastructure sufficiency issues relating to spatial strategy scenarios, making best use of the opportunities arising from the SDS to address identified constraints in utilities, security and resilience and social infrastructure.</i>
Green Infrastructure & Natural and Historic Environmental Assets	<i>The West of England 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, they have</i>	<i>The West of England 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. Partnership work to deliver the JGIS Action Plan and review and add to JGIS evidence is</i>	<i>The West of England 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. Partnership work to deliver the JGIS Action Plan and review and add to JGIS evidence is</i>

Strategic matter	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)	Agreement reached in SoCG Version 3 (January 2022)
	<p><i>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.</i></p> <p><i>The West of England 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.</i></p>	<p><i>ongoing, including agreement from Combined Authority councils to embed the principles of the JGIS into Local Plans and support its consistent application in plan-making, particularly in light of the Environment Bill. Engagement with partners also ensures that agreed outcomes from the JGIS are reflected in other SDS workstreams and assessments such as the IIA and HRA.</i></p> <p><i>The West of England 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 and their setting, including building a resilient and robust Nature Recovery Network, and factoring in appropriate constraints considerations to development capacity analysis and IIA work.</i></p>	<p><i>ongoing, including agreement from Combined Authority councils to embed the principles of the JGIS into Local Plans and support its consistent application in plan-making, particularly in light of the Environment Bill. Engagement with partners has continued to shape SDS workstreams and assessments including the IIA and HRA.</i></p> <p><i>The West of England Authorities continue to work across boundaries to consistently assess and manage direct and indirect development impacts (including opportunities for enhancement) on natural and historic environmental assets and their setting, including building a resilient and robust Nature Recovery Network, and factoring in appropriate constraints considerations to development capacity analysis and IIA work.</i></p> <p><i>Issues that are identified through these assessments with the potential for cross-boundary issues (including impacts arising from growth on the Severn Estuary) are being discussed with key partners and neighbouring authorities as appropriate to ensure the policy framework and</i></p>

Strategic matter	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)	Agreement reached in SoCG Version 3 (January 2022)
			<i>implementation of it incorporates and delivers suitable mitigations.</i>
Minerals	<i>The West of England Minerals Planning Authorities have agreed to 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</i>	<i>The West of England Minerals Planning Authorities have agreed to 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.</i>	<p><i>The West of England Minerals Planning Authorities have agreed to 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.</i></p> <p><i>South Gloucestershire Council and North Somerset Council will work jointly as part of their duty to cooperate obligations to inform Local Plan minerals policies.</i></p>

Appendix 2: Strategic Planning Forum Membership, December 2021

West of England Combined Authority		
David Carter	Director of Infrastructure (Chair)	West of England Combined Authority
Laura Ambler	Head of Housing and Planning	West of England Combined Authority
Sophie Donaldson	Strategic Planning and Policy Lead	West of England Combined Authority
Jason Humm	Head of Transport	West of England Combined Authority
Kathryn Vowles	Head of Capital Delivery	West of England Combined Authority
Heads of Planning		
Simon De Beer	Head of Planning	Bath & North East Somerset Council
Zoe Willcox	Director: Development of Place	Bristol City Council
Brian Glasson	Head of Strategic Planning and Housing	South Gloucestershire. Council
Richard Kent	Head of Planning	North Somerset Council
Infrastructure Providers		
Richard Cresswell	Chair	Bristol Avon Catchment Partnership
Zoe Hancock	Catchment Partnership Coordinator	Bristol Avon Catchment Partnership
Patric Bulmer	Head of Water Resources and Environment	Bristol Water
Anthony Plumbly	Regional Planning Lead	Department for Education
Liz Pickering	Forward Planning	Department for Education
Dave Pring	Planning Specialist	Environment Agency
Samantha Dawe	Wessex Environment, Planning and Engagement Manager	Environment Agency
Sean Walsh	Route Manager	Highways England
Rohan Torkildsen	Partnerships Team Leader SW/Historic Environment	Historic England
Philip Farrell	Head of Accelerated Delivery – SW	Homes England
Russell Baldwinson	Executive Director of Development	LiveWest
Lily Anna Stokes	Marine Planner – South West	Marine Management Organisation
Sophie Kendall	Marine Planner – South West	Marine Management Organisation
Simon Stonehouse	Senior Planning Advisor - Somerset, Avon and Wiltshire	Natural England
Malcolm Parsons	Industry Programme Director – WoE	Network Rail
Daniel Round	Strategic Planning Lead	Network Rail
Robert Hayday	Head of Programme Management	NHS BNSSG CCG
Tracey Cox	Chief Executive	NHS B&NES, Swindon and Wilts CCG
Dominic Gallagher	Health and Wellbeing Manager	Office for Health Improvement and Disparities
Ishani Kar Purkayastha	Consultant	Office for Health Improvement and Disparities
Fionna Vosper	Public Health representative	South Glos. Council
Lynn Gibbons	Public Health representative	South Glos. Council
Jon Rattenbury	SW Energy Hub Programme Manager	South West Energy Hub
Lucy Mason	Future of Energy Manager	Wales & West Utilities Ltd
Oliver Lancaster	Distribution Manager	Wales & West Utilities Ltd
Stuart Gardner	Partnership Manager	WENP
Ian Barrett	Interim Chair	WENP
Ruth Barden	Head of Environment and Catchment Strategy	Wessex Water
Neil Patten	Distribution Manager	Western Power Distribution
Neighbouring Authorities		
Andrew Gregory	Director of Planning, Transport & Environment	Cardiff City Council

Christine Gore	Strategic Director	Cotswold District Council
Nigel Gibbons	Forward Planning Manager	Forest of Dean District Council
Simon Excell	Lead Commissioner Strategic Infrastructure	Gloucestershire County Council
Andre Sestini	Principal Planning Policy Officer	Mendip District Council
Frances O'Brien	Chief Officer for Enterprise	Monmouthshire County Council
Craig O'Connor	Head of Planning	Monmouthshire County Council
Matthew Sharp	Planning Policy Manager	Newport City Council
Nick Tait	Planning Policy Lead	Sedgemoor District Council
Helen Vittery	Planning Manager	Somerset County Council
Paula Hewitt	Lead Director for Economic and Community Infrastructure	Somerset County Council
Brendan Cleere	Strategic Director of Place	Stroud District Council
Tom Evans	Strategic Planning Team leader	Swansea Council
Sam Fox	Corporate Director for Place	Wiltshire Council

NB – other officers from the Combined Authority and the authorities to attend / deputise as appropriate