

# West of England Combined Authority Area

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

## Statement of Common Ground for Strategic Planning Version 2: September 2021

---

### **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 in seeking to resolve cross-boundary issues. This statement is a record of the decisions made in addressing these through various discussions, and joint-working where appropriate. This is to fulfil the obligation set out in the 2019 National Planning Policy Framework to demonstrate ‘effective and ongoing joint working’ through maintaining a SoCG ‘documenting the cross-boundary matters being addressed and progress in cooperating to address these’.

Version 1 of the West of England Combined Authority Area Statement of Common Ground was published in September 2020. This version provides an update reflecting ongoing joint working on strategic and cross boundary matters and documenting the outputs of emerging evidence workstreams to support and inform the Spatial Development Strategy and the constituent local authority Local Plans.

#### **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 (W of E) Combined Authority area Spatial Development Strategy 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.

## **Strategic matters requiring cross-boundary collaboration**

In the first version of the Combined Authority area SoCG, the following matters were identified as having relevant cross-boundary dimensions to be explored through plan-making, initially through the evidence base which will help identify issues and opportunities that can be addressed through plans.

- 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

Table 1 summarises the content of Version 1 of the Statement of Common Ground (September 2020) and sets out the position on the above topics agreed for Version 1 and Version 2.

**Table 1: Summary of West of England Combined Authority area Statement of Common Ground Version 1 (September 2020)**

Strategic matter	Summary of strategic matters as identified in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)
<b>Clean and Inclusive</b>	<ul style="list-style-type: none"> <li>• W of E authorities recognise the value of establishing shared objectives to drive investment and key decisions in the region, demonstrated through joint working arrangements (2019 Local Industrial Strategy, Joint Committee)</li> <li>• The Covid-19 pandemic shifted focus towards securing economic recovery, to be achieved through the agreed principle of 'Clean and Inclusive Recovery and Growth'.</li> <li>• The 17 UN Sustainable Development Goals provide useful global reference points and will be used to inform the preparation of the SDS</li> </ul>	<p><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></p>	<p><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></p>
<b>Carbon emissions and air quality</b>	<ul style="list-style-type: none"> <li>• The five West of England authorities have declared climate emergencies and an aspiration to accelerate the shift to 'Zero Carbon'.</li> <li>• Therefore, Clean and Inclusive growth efforts are focussed on reducing carbon emissions</li> </ul>	<p><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-</i></p>	<p><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</i></p>

Strategic matter	Summary of strategic matters as identified in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)
	<ul style="list-style-type: none"> <li>Addressing air quality also requires cross boundary planning response (cross boundary movements and networks drive both carbon and air pollution problems).</li> </ul>	<p><i>boundary activity affecting emissions.</i></p>	<p><i>ambition to be zero carbon by 2030, and improving air quality.</i></p>
<b>Health inequality</b>	<ul style="list-style-type: none"> <li>The SDS must have regard to the impact of development on health inequality</li> <li>Public health co-ordination and NHS strategic planning occurs on a cross-boundary basis in the area</li> <li>Many ‘wider determinants of health’ (such as active travel opportunity, air quality and access to green space) likewise play out on a cross-boundary basis.</li> </ul>	<p><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></p>	<p><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></p>
<b>Housing including affordable housing, quantity and distribution</b>	<ul style="list-style-type: none"> <li>National Policy requires strategic policies to be informed by a Local Housing Needs Assessment (LHNA) using the prescribed national methodology (the ‘Standard Method’) to assess the minimum number and variety of housing is required to meet the need of the Combined Authority area.</li> <li>The Combined Authority councils fall within 2 HMAs (Bristol, South Gloucestershire &amp; North Somerset and Bath &amp; North East Somerset) this provides an effective geography to undertake a</li> </ul>	<p><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></p> <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</i></p>	<p><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 capacity assessments through</i></p>

Strategic matter	Summary of strategic matters as identified in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)
	<p>West of England LHNA to ascertain both the quantum and the breakdown of housing need.</p> <ul style="list-style-type: none"> <li>• A joint SHLAA (Strategic Housing Land Availability Assessment) methodology with consideration of employment land needs and opportunity will be prepared</li> <li>• The HELAA together with the LHNA will inform the housing requirement in the Combined Authority area. As the plan-making process progresses, this will be supplemented by more specific work testing plan viability.</li> </ul>	<p><i>understanding of the potential housing land available in the sub-region</i></p>	<p><i>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><b>Employment, including retail, leisure and other commercial development.</b></p>	<ul style="list-style-type: none"> <li>• The 2011 Census defined the West of England as a Functional Economic Market Area (FEMA).</li> <li>• Accordingly employment land and spatial needs are most effectively explored over this geography.</li> </ul>	<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</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/Sevenside, recognising that some sectors will continue to have urban land needs, and the desirability of bringing forward additional land</i></p>



Strategic matter	Summary of strategic matters as identified in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)
		<i>(including digital networks, the port and airport) in the functioning of the economy</i>	<i>supply. This will inform ongoing discussions with neighbouring authorities with most significant functional economic relationships with the Combined Authority area.</i>
<b>Green Belt</b>	<ul style="list-style-type: none"> <li>The Bristol and Bath Green Belt extends beyond the Combined Authority area boundary, meaning it is a cross-boundary issue</li> </ul>	<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>
<b>Development quality</b>	<ul style="list-style-type: none"> <li>Design quality is a common issue and a consistent approach is helpful across the West of England area given similar developers etc working across authorities.</li> </ul>	<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 consistent approach to engaging with developers to ensure new</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 development quality in the SDS. Ongoing joint</i>

Strategic matter	Summary of strategic matters as identified in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)
		<i>development contributes to achieving sustainable and inclusive communities as well as local distinctiveness</i>	<i>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>
<b>Transport &amp; connectivity including digital, and international via port and airport</b>	<ul style="list-style-type: none"> <li>• Cross-boundary movements including those causing significant congestion and air pollution problems, are particularly focussed within the West of England, though clearly extend beyond in all directions.</li> <li>• Key international connectivity serving the sub-regional economy is provided via the Port and Airport</li> <li>• A new transport model for the sub-region is being commissioned alongside a transport appraisal framework (TAF) that will enable the development and testing of a variety of infrastructure proposals and wider development scenarios.</li> </ul>	<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>
<b>Utilities Security and</b>	<ul style="list-style-type: none"> <li>• The West of England authorities will work with the utilities providers and waste</li> </ul>	<i>West of England authorities recognise the importance of working together</i>	<i>The West of England Combined Authority and its constituent councils</i>

Strategic matter	Summary of strategic matters as identified in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)
<b>Resilience and Social Infrastructure</b>	<p>authorities to establish existing capacity for growth, potential to expand this and refocus infrastructure on new strategic priorities</p> <ul style="list-style-type: none"> <li>• In the Combined Authority area, flood risk is the subject of cross-boundary co-ordination with support from the Environment Agency.</li> <li>• Some social infrastructure requires appropriate cross-boundary collaboration to manage the consequences of growth and to ensure that associated transport needs are addressed.</li> </ul>	<p><i>and with other infrastructure providers and commissioners to ensure infrastructure serving cross-boundary needs is able to accommodate growth and best support other cross-cutting priorities for change. This will involve multi-disciplinary working at a variety of scales to investigate opportunities and options</i></p>	<p><i>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. In the case of flood risk, this will include agreeing the approach to the sequential and exceptions tests.</i></p>
<b>Green Infrastructure &amp; Natural and Historic Environmental Assets</b>	<ul style="list-style-type: none"> <li>• The five West of England Authorities will continue to work with our environmental partners to develop the environmental data and technical evidence to deliver the Joint Green Infrastructure Strategy.</li> <li>• The Combined Authority area authorities have agreed to jointly commission an update to their 'Priority Habitats' mapping data</li> <li>• Cross boundary evidence base co-ordination has been at a landscape scale through the JGIS. This provides consistent</li> </ul>	<p><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 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</i></p>	<p><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 ongoing, including agreement from Combined Authority councils to embed the principles of the JGIS into Local Plans</i></p>



Strategic matter	Summary of strategic matters as identified in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)
	<p>information to support the SHLAAs and impact assessments.</p>	<p><i>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>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>
<b>Minerals</b>	<p>The UAs work together in assessing needs, including for cross boundary transport infrastructure and plan for a steady and adequate supply through their Local Plan preparation.</p>	<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</i></p>	<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</i></p>

Strategic matter	Summary of strategic matters as identified in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 1 (Sept 2020)	Agreement reached in SoCG Version 2 (September 2021)
		<i>Party in line with national policy and guidance</i>	<i>Aggregates Working Party in line with national policy and guidance.</i>

## Table of Contents

EXECUTIVE SUMMARY .....	i
Table 1: Summary of West of England Combined Authority area Statement of Common Ground .....	iii
Version 1 (September 2020) .....	iii
1. Introduction.....	2
2. Parties Involved & Signatories.....	2
3. Spatial Development Strategy Plan period.....	4
4. Strategic Planning Matters requiring cross boundary collaboration 4	
5. Update on strategic priorities and cross cutting issues .....	5
(September 2021) .....	5
Clean and Inclusive .....	5
Carbon emissions and air quality .....	6
Health inequality.....	7
Housing including affordable housing, quantity and distribution .....	7
Employment, including retail, leisure and other commercial development.....	10
Green Belt .....	11
Development Quality .....	13
Infrastructure.....	14
Transport & connectivity including digital, and international via port and airport.....	14
Utilities – energy/water/sewerage/waste.....	17
Security/resilience Infrastructure including flooding.....	17
Social Infrastructure - health, cultural and educational facilities of sub-regional significance.....	18
Green Infrastructure (GI).....	19
Sub-regional economic, place-making and ecological assets .....	20
Minerals 21	
6. Timetable for Review and Update.....	22
Appendix 1: Summary of the scope of the Statement of Common Ground.....	23
Appendix 2: Strategic Planning Forum Membership, August 2021....	25

## 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 the SOCG are detailed in version 1 of the Statement of Common Ground and are summarised in Appendix 1.

## 2. Parties Involved & Signatories

### Signatories

- 2.1 Signatories to Version 2 of the Statement of Common Ground are the West of England Combined Authority constituent Unitary Authorities (UAs) (South Gloucestershire (SGlos), Bath & NE Somerset (B&NES), Bristol (BCC)) and the West of England Combined Authority (including the West of England Transport Authority).
- 2.2 Whilst North Somerset Council was a previous additional named signatory to the Version 1 SoCG, reflecting the extent of joint commissioning work, this is not seen to be appropriate as we move into the SDS plan-making phase. North Somerset Council is maintaining a SoCG for their Local Plan with their own set of cross-boundary strategic planning issues developed through their own Duty to Co-operate discussions.
- 2.3 The document has also been taken through the West of England Strategic Planning Forum to ensure signoff of relevant content from a wider range of Duty to Co-operate bodies/neighbouring authorities as allowed for through the Strategic Planning Forum terms of reference.
- 2.4 The West of England Strategic Planning Forum comes together periodically to review the conclusions of collaborative discussions between strategic bodies – which feed in to the SoCG - and sign them 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.
- 2.5 The Strategic Planning Forum has met four times since August 2020. This engagement with statutory bodies and infrastructure providers has been supplemented with bilateral discussions as required including with the following organisations:
  - Bristol Water
  - Department for Education
  - Department for Transport



- Environment Agency
- Highways England
- Historic England
- NHS Bristol, North Somerset and South Gloucestershire CCG
- Open Reach
- South West Energy Hub
- Wales & West Utilities
- Wessex Water
- Western Power Distribution

***Confirming that agreement has been reached on the strategic matters as set out in boxes 1 to 12 below:***

**Organisation:** South Gloucestershire Council


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

**Signed:** 

**Date:** 24/09/21

**Organisation:** Bath & North East Somerset Council


**Name & Position:** Sophie Broadfield, Director of Sustainable Communities

**Signed:** 

**Date:** 20/9/2021

**Organisation:** Bristol City Council


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

**Signed:** 

**Date:** 28/09/21

**Organisation:** West of England Combined Authority

**Name & Position:** Kathryn Vowles, Interim Director of Infrastructure

**Signed:** 

**Date:** 29/09/2021

### **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 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 them in either the SDS or Local Plans as this will be determined in an evidence-led way.
- 4.3 A summary of the strategic priorities and cross cutting issues identified in Version 1 of the SoCG is provided in Table 1 on page iii.

## 5. Update on strategic priorities and cross cutting issues (September 2021)

### Clean and Inclusive

- 5.1 The Combined Authority councils recognise the value in agreeing shared objectives with which to shape strategies and investment across the region. A set of objectives will frame the SDS and ensure alignment with national policy and other shared reference points (such as the UN Sustainable Development Goals). The overarching objective of the SDS is *Clean and Inclusive Recovery and Growth*. A set of clean and inclusive growth principles have been developed for the SDS which reflect the priorities of addressing the climate and ecological emergencies. The principles have been shaped by engagement with key partners and through the Future of the Region survey.
- 5.2 The clean and inclusive growth principles reflect Combined Authority’s priorities for future growth and will be used through the plan making process to identify key issues and inform the spatial planning approaches to resolve them.

SDS objectives:	1. Recovery and Growth that is clean and inclusive	2. A Cleaner region	3. A more inclusive region
Clean and inclusive growth principles:	1.1 Ensure enough homes for a growing and changing population	2.1 Contribute to realising the area’s Zero Carbon by 2030 ambition	3.1 Improve affordability and availability of suitable homes in mixed communities for all, enabling greater choice
	1.2. Support a successful and resilient low carbon economy with inclusive opportunity and reducing environmental impact at its core	2.2 Conserve and enhance our natural environment, to achieve biodiversity net gain and ensure nature’s recovery	3.2 Ensure local access to a range of economic, social and well-being opportunities
	1.3 Ensure sufficient quality infrastructure provision that works together to enable a greener and a better quality of life and economy for all	2.3 Contribute to a reduction in pollution and to seeking to exceed legal standards for air quality	3.3 Improve affordable sustainable connectivity to ‘beyond local’ opportunity (jobs, leisure, services, education)
	1.4 Enable evolution, renewal and regeneration of place	2.4 Support the creation of greener places and a greener built environment that brings nature closer to people	3.4 Improve resilience of people and places to climate change impacts (extreme weather and flooding)
			3.5 Improving resilience of people and place to economic and social change
			3.6 Achieve better (healthier, quality, distinctive) Places for All, valuing place assets and working to address deficiencies

#### 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

- 5.3 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.
- 5.4 The SDS Integrated Impact Assessment framework has been developed to ensure the early integration of sustainability considerations into the development of the SDS and to ensure that the Combined Authority meets legislative requirements for impact assessments<sup>1</sup>. The IIA objectives reflect the clean, inclusive growth principles (which have in themselves been informed by an IIA compatibility assessment) and include improving air quality and contributing to reducing carbon emissions. The SDS will also be subject to HRA which will consider the impacts of air quality on European sites.

Key evidence under development particularly focussed on achieving contribution to zero carbon objectives include:

- A Renewable Energy Resource Assessment Study (RERAS). This is considering opportunities to optimise renewable energy generation from solar, wind and hydro power across South Gloucestershire, Bath & North East Somerset and North Somerset.
- Net Zero carbon evidence base review. This is considering the practical and viability considerations relating to different approaches to achieve zero carbon development that may be taken forward through the SDS and Local Plans in the West of England.
- A Carbon Impact Assessment (CIA) tool. This tool will be used to capture impacts from spatial dimensions of the different spatial strategy scenarios including the quantum, nature and distribution of development and infrastructure, and used as part of scenario appraisal and policy scoping. The tool captures key aspects of development including construction and operation, transportation, buildings, infrastructure and offsetting. This provides a supplementary evidence base to consider alongside wider sustainability considerations analysed in the Integrated Impact Assessment. This tool is available for use by UA partners across the West of England.

### *2. Carbon emission and air quality*

*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.*

---

<sup>1</sup> This includes Strategic Environmental Assessment, Equality Impact Assessment, Community Safety Assessment, Health Impact Assessment.



## Health inequality

- 5.5 Engagement with relevant health bodies has supported the identification of key opportunities for the SDS and Local Plans to contribute to addressing health inequalities through influencing the wider determinants of health. This priority is reflected in the IIA assessment framework. It is also reflected through inclusion in the scope of design quality / placemaking policy, enabling sustainable and active travel through policy and spatial strategy, addressing air quality and recognition of the multi-benefits (including health) of zero carbon and green infrastructure.
- 5.6 Engagement with health bodies and review of health evidence has also highlighted the risks to health that have been exacerbated through the Covid-19 pandemic, which the SDS may support addressing, through placemaking and green infrastructure policy. This includes access to green space and social and recreational activities which influence health outcomes.
- 5.7 Access to health services will be picked up through social infrastructure component of the infrastructure evidence base (see paras 5.48 - 5.49).

### 3. Health inequality

*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.*

## Housing including affordable housing, quantity and distribution

### Local Housing Needs Assessment<sup>2</sup>

- 5.8 A Local Housing Needs Assessment (LHNA) has been undertaken to assess the nature and make-up of current and future housing needs across the area. It provides robust evidence to support plan-making, underpin planning policy requirements such as Affordable Housing and to inform housing strategy.
- 5.9 The overall Local Housing Need is derived from the NPPF standard methodology for calculating housing need published by the Government in December 2020<sup>3</sup>. The LHNA sets out the housing need for each UA and for the combined authority area. As the NPPG confirms: *Housing need is an unconstrained assessment of the number of homes needed*

---

<sup>2</sup> <https://www.westofengland-ca.gov.uk/spatial-development-strategy/>

<sup>3</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#housing-need>

*in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.*<sup>4</sup> 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 in 2022.

- 5.10 For the WofE CA area, the housing need over the 20-year period of the SDS is 105,120 dwellings<sup>5</sup>. Of this, the affordable housing need is 34,646. This is a challenging level of housing need, reflecting the affordability issues in the sub-region which often go hand in hand with being an economically successful and prosperous place, as well as the significant urban uplift figure (35%) applied to the Bristol urban area.
- 5.11 The level of housing need identified through the LHNA provides a benchmark against which to develop spatial scenarios. These will strive to meet the needs identified for the plan area in the LHNA. If this work establishes that this need cannot be met, this will act as a starting point for discussions on unmet need with neighbouring authorities. These discussions will also be informed by understanding of where need has been identified.
- 5.12 Initial discussions suggest that neighbouring authorities are not in a position to accommodate any unmet need arising from the Combined Authority area. The Gloucestershire and Somerset authorities and Wiltshire council all anticipate significant challenge to meet their authorities' housing need under the standard methodology due to environmental and delivery constraints.
- 5.13 National guidance sets out that the neighbouring authorities that fall within the same housing market area are particularly important to engage with in this context. Given the close proximity and functional economic / transport relationships with North Somerset, the approach to housing need arising from the Combined Authority area and North Somerset and implications for accommodating any potential unmet need from either will be a key cross-boundary issue to address through the next stage of plan preparation.
- 5.14 Early discussions with authorities in the south of Wales have taken place. South East Wales are in the very early stages of preparing a Strategic Development Plan (SDP) which will consider growth and allocate development accordingly. Until the adoption of the SDP, the authorities in the south of Wales will continue to develop their own

---

<sup>4</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> (Para 001)

replacement local development plans which will outline growth in each local authority area. There is potential for further discussion concerning potential 'unmet need' with the W of E Combined Authority, particularly in areas of Monmouthshire and Newport where good regional connections have been identified and where there may be benefit from an economic and demographic perspective.

## Strategic Housing Land Availability Assessment

- 5.15 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 and will inform agreed numbers for input to the spatial strategy and provide a basis for any discussions on unmet need with neighbouring authorities.
- 5.16 National policy and regional objectives highlight the importance of the efficient use of land including focusing growth in existing urban areas. This means growth will be prioritised in existing centres with sufficient infrastructure and connectivity. This driver, along with the standard methodology's 35% urban uplift, means the assessment of urban capacity will be a key aspect of the SHLAA evidence, and is likely to be subject to cross-boundary discussions to ensure all sources of delivery with reasonable prospect have been identified.

### 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 34,646<sup>6</sup>. This housing need figure provides a benchmark against which to develop and evaluate spatial scenarios. This work will be undertaken with input from ongoing 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.*

---

<sup>6</sup> This will be re-calculated and re-based to 2042 when new data is made available in early 2022.

## Employment, including retail, leisure and other commercial development

### Employment Land Spatial Needs Assessment<sup>7</sup>

- 5.17 As identified in Version 1 of the SoCG, the focus of collaboration on employment issues is the development of the evidence-base, plan-making and monitoring concerning economic recovery and growth, distribution of employment-generating development, and the re-focusing of it on clean and inclusive principles.
- 5.18 The Employment Land Spatial Needs Assessment (ELSNA) for the West of England area (covering the Combined Authority area and North Somerset) considers the future spatial needs of retail, commercial, leisure and waste employment-generating businesses, as well as more traditional industrial uses.
- 5.19 Key strategic issues identified through the ELSNA include:
- Limited availability (and loss) of medium and smaller industrial sites in accessible areas leading to dispersal of industrial occupiers to outlying locations in South Gloucestershire and along the M5 corridor.
  - Recognition of the strategic contribution of key assets including enterprise areas to supporting the regional economy including the key growth sectors identified in the ELSNA.
  - The supply of available land and market ready storage and distribution sites in Avonmouth and Severnside is diminishing and over-relied on, with a need for diversification and additional locations.
  - The West of England office market is constrained by low supply levels with a substantial undersupply of Grade A space.
  - Lack of sustainable transport connectivity to key employment areas such as Avonmouth and Severnside and the North Fringe restricts access to employment for the sub-region's most deprived localities and constrains labour market reach.
  - COVID-19 has reinforced existing trends and will have implications for employment land demand including:
    - greater potential for more dispersed demand including increased home working and clusters of smaller employment land requirements, located close to residential areas.
    - increased demand for large premises to support shifts in consumer behaviour to online, to accommodate economies of scale, including 'super sheds'.

---

<sup>7</sup> <https://www.westofengland-ca.gov.uk/spatial-development-strategy/>



- recent shift in retail stock on the high street, especially in Bristol and Bath City Centres is likely to generate available space that previously would not be so available for other uses.

5.20 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.

5.21 The ELSNA study has 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 Council given that it is part of the Functional Economic Market Area.

5.22 The ELSNA has not highlighted any key issues affecting cross-boundary connectivity to key sectors outside of the West of England.

## 5. Employment

*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.*

## Green Belt

5.23 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 urban Green Belt extending beyond the W of E Combined Authority local authority boundaries.

5.24 The Combined Authority has commissioned a Green Belt assessment suitable to support the SDS – i.e. a proportionate, objective, transparent, comprehensive and consistent assessment of the strategic role and function of the Bristol and Bath Green Belt within the administrative areas of the Combined Authority councils. The assessment will identify broad variations in the role of land in relation to each of the five national purposes, defining parcels of land with ratings and supporting text, and sub areas within

these parcels where potential harm will be assessed. An understanding of the key components of harm to the Green Belt purposes, within different locations within the Combined Authority area will be used to inform the preparation of the SDS notably evaluation of scenarios that involve green belt land.

- 5.25 Engagement with key statutory bodies and relevant neighbouring authorities on the Green Belt assessment methodology has been undertaken and responses considered by the consultants undertaking the work; no material amendments to the methodology are considered to be needed. Consideration of how adjacent land within neighbouring authorities affects the performance of land within the Combined Authority area may require further discussion with neighbouring authorities; where this occurs it will be documented in the next iteration of the Statement of Common Ground.
- 5.26 Around 22% of the Bristol and Bath Green Belt is within the administrative boundary of North Somerset Council. North Somerset Council published a separate assessment of the Green Belt within their boundaries as part of work the new Local Plan<sup>8</sup>. Around 10% of the Bristol & Bath Green Belt is within Wiltshire. Wiltshire Council have not identified exceptional circumstances requiring a need for Green Belt review thus far in the preparation of their Local Plan. Both Councils provided comments on the Combined Authority area Green Belt assessment methodology and engagement will continue as necessary as outputs are progressed.
- 5.27 It is also noted that Future Wales National Plan for Wales requires the identification of a Green Belt to the north of Cardiff, Newport and the eastern part of the region to manage urban form and growth. The plan notes that this must consider the relationship with the Green Belt in the West of England<sup>9</sup>. Discussion with the relevant Welsh authorities may be required in due course.

## 6. Green Belt

*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*

---

<sup>8</sup> <https://www.n-somerset.gov.uk/sites/default/files/2021-04/North%20Somerset%20green%20belt%20assessment%20April%202021.pdf>

<sup>9</sup> <https://gov.wales/future-wales-national-plan-2040>

## Development Quality

5.28 Design, character and placemaking have a key role in ensuring new development contributes to the achievement of sustainable development, the region's strategic objective of clean, inclusive recovery and growth and to the clean & inclusive principles that will guide the SDS. To support achieving these objectives, high quality places will be promoted through a Placemaking policy in the West of England Spatial Development Strategy (SDS).

5.29 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 placemaking policy in the SDS. A clear understanding of the relevant issues in the West of England is of particular value to support the scoping of policy. Issues and priorities raised through the above engagement have been considered along with others identified through evidence review. Those of most relevance to a strategic Placemaking policy for the SDS are considered to be:

- Achieving sustainable development
- Enhancing landscape, character and identity including natural, built and historic environment
- Development quality
- Health and health inequalities
- Social Inclusion and addressing inequalities (including community engagement)
- Connectivity
- Responding to climate change and its consequences
- Nature and Biodiversity
- Housing type, tenure and quality
- Promoting mixed use communities and efficient use of land
- Post-permission issues including management and stewardship
- Design tools and processes

5.30 These are not considered to raise specific cross-boundary issues. Opportunities to strengthen consistency in approaches to support regional aspiration for development quality will be discussed with relevant strategic partners as required.

### *7. Development Quality*

*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 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

- 5.31 Infrastructure including transport, digital, utilities, social, green infrastructure and key regional connectivity assets serving the wider region (such as the Port and Bristol Airport in North Somerset) has potential to facilitate or create cross boundary movements including those that cause significant congestion and air pollution problems. Infrastructure also plays a key role in addressing strategic and cross boundary issues for example through supporting sustainable transport to reduce car journeys and ensuring sufficient provision of key assets and services for existing and new communities.
- 5.32 An Infrastructure and Investment Delivery Plan (IIDP) is being developed to provide the infrastructure evidence base for the SDS and set out the wider delivery plan to ensure an appropriately integrated approach to infrastructure. The identification of existing infrastructure constraints/ issues and infrastructure interventions has been undertaken through a combination of document reviews and engagement with infrastructure providers, commissioners, and others with strategic oversight, to establish key dependencies, possible strategic spatial impacts, and the degree of certainty that can be attributed to infrastructure interventions/ possible responses to issues. This will be periodically updated as the SDS progresses to ensure the most up to date information is being worked with in plan-making.
- 5.33 The IIDP scope includes physical (transport, utilities, waste, digital) social (education and health), green infrastructure and climate change adaptation related infrastructure such as flood defences and renewable energy projects in the Combined Authority area and beyond where cross boundary implications are relevant.

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

- 5.34 Version 1 of the Statement of Common Ground identified the strategic issues arising from transport and connectivity including:
- Transport networks of all types – road, rail, cycling and walking routes – extend across local authority boundaries, as do movements of people and vehicles. These cross-boundary movements including those causing significant congestion and air pollution problems, are particularly focussed within the West of England, though clearly extend beyond it in all directions.
  - Key international connectivity serving the sub-regional economy is also provided for within this geographical area (wider West of England including North Somerset), notably via the Port and Airport. Consideration of the contribution of strategic assets to green economic recovery is also a potential area for cross boundary discussion. Digital connectivity is increasingly recognised as a complementary strategic network.

5.35 Collation of evidence (including through engagement with infrastructure providers and commissioners) on transport and connectivity to date has identified the following key baseline issues and constraints relating to transport and connectivity:

- Lack of resilience on both the strategic road network and local highway network
- Congestion on the strategic road particularly at peak hours and during summer season.
- Lack of sustainable, rapid and reliable public transport in some areas of the region
- Constraints on rail network affecting capacity and frequency of services
- Lack of safe and well-connected walking and cycling infrastructure
- The location of two key strategic economic and transport infrastructure assets in North Somerset (Bristol Airport and Bristol Port) gives rise to strategic cross boundary issues relating to surface access that will need joint work to address.
- There are no significant barriers / constraints to the availability or deliverability of digital infrastructure, however social barriers (financial, technical etc) to accessing digital infrastructure may be present.

5.36 Initial work for the IIIDP has analysed infrastructure investment/intervention-related opportunities that help address these issues (including new technologies and approaches to demand management) and in some cases create new spatial relationships. Strategic transport interventions of particular relevance to strategic growth by enhancing connectivity are focused on key corridors, and improvements to transport hubs, walking and cycling and interchange possibilities.

5.37 Accordingly, 4 sustainable transport based scenarios have been developed:

1. Focused on existing mostly urban (plus A4 corridor) sustainable transport connectivity and key interventions being delivered within the next 5 years such as Metrobus extensions, walking and cycling enhancements.
2. Working with the opportunity that could be brought about by enhancements to key connectivity corridors which are the subject of multi-modal improvement studies.
3. Working with the opportunity that could be brought about by new stations and service enhancements – extending suburban connectivity to new areas and potentially increasing urban density potential.
4. Working with the opportunity that could be brought about by extending good quality urban transport routes to new areas just beyond them.

Scenarios also take into account the potential of new development of a certain scale to increase walkability by providing new facilities including digital connectivity.

5.38 Review of the current investment pipeline shows that sustainable transport and connectivity investment with strategic spatial impacts is focused within the Combined Authority area. Strategic investment across the SDS area boundary (ie in other

authorities) that might facilitate significant growth within the SDS area (and therefore influence SDS spatial scenarios) has not been identified.

- 5.39 Considerable ongoing engagement between neighbouring authorities to address sub-regional transport issues supports the common understanding of travel patterns and movements, infrastructure sufficiency issues. Engagement with authorities will continue through the testing of spatial scenarios to identify potential impacts on the sub-regional transport network that may require joint working to address.
- 5.40 Engagement with neighbouring authorities and infrastructure providers will continue to review planned infrastructure investment and work through the necessary cross-boundary co-ordination of delivery and management of impacts of these and other interventions. Those that have been flagged to date include:
- Metrowest Phase 1 – new stations at Portishead and Pill connecting with Bristol Temple Meads
  - Improvements to the strategic road network including motorway junction capacity, particularly along the M5 both within the West of England Combined Authority area and to the north and south, including in North Somerset, Somerset and Gloucestershire.
  - The Gloucestershire authorities have highlighted planned growth along the mainline railway corridor, including Cam and Dursley and potential new station at Stonehouse. This will have implications for the M5 and A38, where junctions are at capacity.
  - Assessments of travel patterns between Welsh authority areas, Gloucestershire and West of England CA area (Monmouthshire Council)
  - Severn tolls resilience package to understand transport implications of the removal of the Severn Bridge tolls (Highways England).
- 5.41 A Transport Assessment Framework (TAF) is being developed to support the SDS preparation and will support spatial scenario testing, alongside additional work to follow through the analysis of sufficiency and develop the understanding of relative deliverability. The development of the TAF has included engagement with North Somerset Council, Highways England and Department for Transport, and engagement with infrastructure providers and commissioners will be an important component of the wider sufficiency and deliverability assessment work.



## 8. 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 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.*

## Utilities – energy/water/sewerage/waste

5.42 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. As with transport networks, management of growth and other infrastructure needs, including Zero Carbon ambitions will necessarily involve cross-boundary collaboration. Increasingly this also requires collaboration between different utility companies.

5.43 Initial infrastructure evidence and engagement with utilities companies to date has identified the following issues:

- Upgrading utilities infrastructure to increase capacity will require strategic approach to investment in some parts of the region
- Water resource management is likely to become a more significant challenge in future, which will also support zero carbon ambitions.
- Some parts of the region may be affected by waste water constraints.
- Certainty around domestic energy efficiency measures and future proofing of homes (eg EV charging, heat pumps and hybrid boilers) will support delivery of utilities infrastructure.

## Security/resilience Infrastructure including flooding

5.44 In the Combined Authority area, flood risk along the Rivers Severn and Avon and their supporting tributaries is the subject of cross-boundary co-ordination with support from the Environment Agency. The UAs maintain their own flood risk assessments, but the EA oversees this, ensuring application of a consistent methodology and appropriate updates in light of new catchment modelling, climate change scenarios and so on.

5.45 Climate change flood scenarios in the SDS area demonstrate that existing flood defences are insufficient on the river Avon (especially central Bristol) and at Severnside and may present significant barriers to future growth in some parts of the region if not resolved. Increased flood risk will also impact the resilience of existing networks such as rail, employment, energy and highways infrastructure.

5.46 Significant investment in flood defences and mitigation is earmarked for a range of schemes in the region, but the central Bristol flood risk mitigation strategy is currently not fully funded. Wider flood and extreme weather resilience work through a multi-benefit green infrastructure approach (see below) will be important to support more traditional approaches.

5.47 Careful consideration of development capacity impacted by flood risk but otherwise performing well in spatial strategy terms will need to include discussion and agreement with the EA to satisfy the sequential and exceptions tests where necessary.

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

5.48 Social infrastructure provision (including health, cultural and educational facilities) and management is of cross-boundary significance where its users come from an area that extends beyond the authority that the facility is based in, or where one or more areas face constraints to provision that are experienced differently in an adjoining area. Much of this is dealt with through strategic consideration of transport accessibility to 'beyond local' facilities.

5.49 Currently the Combined Authority area has constraints in relation to education provision due to population growth. The following issues in relation to education and healthcare infrastructure have been identified:

- Insufficient secondary school capacity including reliance on some schools in North Somerset which may have implications should additional growth be proposed in areas reliant on that capacity.
- Lack of new GP practices
- Constrained land availability for schools and health facilities, particularly in locations where demand is high making journeys longer
- Funding constraints to bring forward new health and education capacity including the cumulative impact of developments that fall beneath the threshold for funding new school places / health facilities

#### *9. Utilities, security and resilience and social infrastructure*

*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. In the case of flood risk, this will include agreeing the approach to the sequential and exceptions tests.*

## Green Infrastructure (GI)

- 5.50 Planning, management and investment in GI is required at strategic, local and site-specific scales. The SDS has an important role to 'set the scene' for subsequent plans and activity to ensure a coherent approach to GI that maximises outputs and integrates GI in to development at appropriate levels.
- 5.51 Green infrastructure deficiencies and opportunities for multiple benefits will also be responded to strategically in the SDS, developing the approach to green infrastructure set out in the Joint Green Infrastructure Strategy (JGIS)<sup>10</sup>. The SDS spatial strategy is working to support the identification of key regional green infrastructure networks and assets along with the identification of programme areas of regional importance to ensure an integrated green infrastructure network.
- 5.52 The integration of multifunctional green infrastructure networks will be embedded through achieving the principles and outcomes of the JGIS through strategic policy. Green infrastructure will also be considered as a spatial opportunity to deliver strategic solutions to environmental impact. In this way, the green infrastructure programme areas will also be mapped into scenarios as a common thread to help realise the SDS objectives. These areas have been identified by considering existing mapping data such as the National Recovery Network (NRN) and identifying areas of greatest impact working with partners and understanding established partner programmes.
- 5.53 Initial evidence review has identified key issues affecting green infrastructure in the Combined Authority area including; increased pressure on existing green infrastructure assets from growing population and lack of a standard approach to deliver GI within the planning system which often leads to varied approaches and definitions of GI delivery.
- 5.54 Opportunities arising from a coordinated approach to GI across the region will enable multi-benefits to be achieved, consolidate environmental evidence and support the region to achieve consistent approach to biodiversity net gain, nature recovery and natural capital accounting. Through joint working, the authorities are also continuing to explore the future process and data needs arising from the Environment Bill.
- 5.55 The SDS evidence will build on existing partnership work to support the development of a joint approach to Biodiversity Net Gain across the West of England and the implementation of projects identified in the JGIS. An approach is being progressed with partners to understand the opportunities for investment in regional GI and nature-based programmes of work.

---

<sup>10</sup> <https://www.westofengland-ca.gov.uk/west-of-england-joint-green-infrastructure-strategy/>

5.56 The SDS Integrated Impact Assessment (IIA) framework includes objectives relevant to GI workstreams, and engagement with key partners has informed the final framework, ensuring it reflects the SDS clean and inclusive growth principles, and emphasise access to nature. The Habitats Regulations Assessment (HRA) will also play a key role in identifying areas of functionally linked habitats where the GI Network, notably the NRN can play a key role in protecting and enhancing protected species' resilience and recovery.

## **Sub-regional economic, place-making and ecological assets**

### **Natural environment**

5.57 The Combined Authority area is bounded by natural cross-boundary features of international and national importance – the two limestone landscapes designated for their outstanding natural beauty - the Cotswolds AONB lies to the east and the Mendip Hills AONB to the south, the Severn Estuary is an international wetland habitat.

5.58 The Combined Authority councils have jointly commissioned an update to their 'Priority Habitats' data to maintain a consistent understanding of the spatial extent of the most important habitats and their sensitivity to change. This is being co-ordinated with work in North Somerset focussing on priority species. It will in turn enable an update 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.

5.59 Natural assets are also being considered through constraints analysis in development capacity assessment, and through the Integrated Impact Assessment, which has been scoped in consultation with key statutory agencies and partners.

### **Historic Environment**

5.60 As identified in V1 of the SoCG, many historic, cultural and landscape features 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 domestic and foreign visitor markets which have been identified as a key sector through the ELSNA study.

5.61 The historic environment will be considered in the SDS through:

- informing the spatial strategy by drawing on asset mapping to acknowledge where potential heritage impacts would be a constraint on potential development capacity, (through the SHLAA);

- as part of the green belt assessment (which will assess land parcels against the national Green Belt purposes, including preserving the setting and special character of historic towns);
- the Integrated Impact Assessment process (which has been scoped with input from Historic England) and
- through the analysis that underpins JGIS programme areas.

5.62 A strategic placemaking policy will also include in scope the historic environment to ensure development makes best use of, and contributes positively to, existing heritage assets.

#### *Green Infrastructure & Natural and Historic Environmental Assets*

10. *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 also ensures that agreed outcomes from the JGIS are reflected in other SDS workstreams and assessments such as the IIA and HRA.*
11. *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.*

## **Minerals**

5.63 Version 1 of the SoCG set out how 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. Initial evidence outputs for the SDS have not identified any further cross-boundary issues relating to minerals for consideration through joint working.

#### *12. 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.*

## **6. Timetable for Review and Update**

- 6.1 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. If changes to the planning system are introduced in this period, review of this initial 'baseline' content regarding strategic matters, relevant geographies and evidence base will also be undertaken.

### **Key SDS gateway decisions**

- 6.2 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.

### **Other review dates**

- 6.3 In-between these key dates, plan-making will progress as the evidence base continues to develop moving into scenario appraisal. This will include discussions with other neighbouring authorities regarding unmet need, (if any arises/has arisen elsewhere).
- 6.4 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**

- 6.5 The next steps are to convene bilateral/smaller group discussions under the umbrella of the Strategic Planning Forum as part of the technical evidence-led exploration of the issues relating to particular strategic matters, opportunities to address them through the SDS and UA Local Plans and understanding of differential impacts of possible spatial responses.



## **Appendix 1: Summary of the scope of the Statement of Common Ground**

1. The National Planning Policy Framework (NPPF) sets out that these authorities should produce, maintain, and update one or more Statements of Common Ground (SoCG) throughout the plan-making process. A SoCG forms part of the evidence required at Plan Examination to demonstrate that they have complied with the Duty to Cooperate (DtC) and/or otherwise collaborated as appropriate.
2. Version 1 of the West of England Combined Authority Area Statement of Common Ground for Strategic Planning was published in September 2020. Version 1 set out the identified strategic, cross-boundary matters to be addressed through plan making including in the preparation of the West of England Spatial Development Strategy (SDS). The cross-boundary matters and agreement reached in version 1 of the SOCG is summarised in Table 1. The full document can be found on the West of England Spatial Development Strategy [webpage](#).
3. This document (Version 2) provides an update on joint working and early outputs of emerging evidence base on strategic and cross boundary matters related to plan making. This reflects the role of the Statement of Common Ground to track the plan-making process, being updated and re-published as discussions, evidence base and analysis, and other aspects of plan-making proceed<sup>11</sup> providing an accessible and public record of where agreements have or have not been reached on cross boundary strategic issues.

### **The requirement for a SoCG covering the West of England Combined Authority area**

4. As set out in Version 1 of the SOCG (para 1.4), while there is no requirement for all authorities within the Combined Authority area to be signatories to a Statement of Common Ground, given the overlap in issues and requirements for joint working for the SDS and the constituent authorities Local Plans, this SOCG is intended to capture in one place the cross-boundary strategic matters. This covers 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.

---

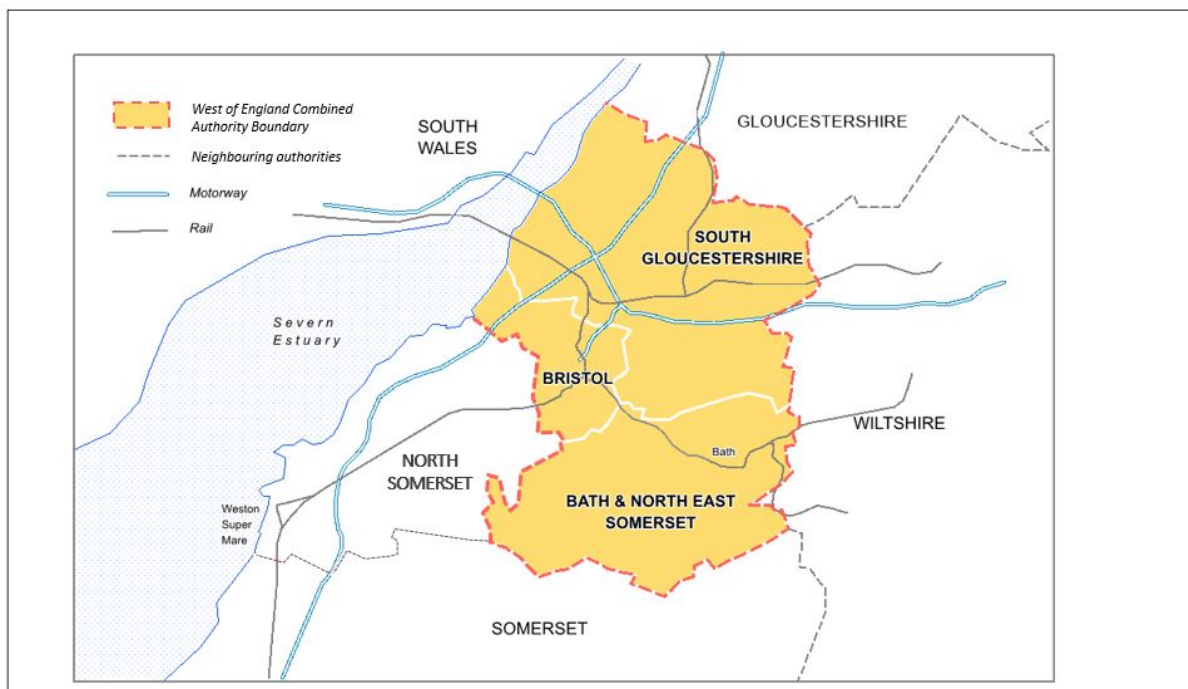
<sup>11</sup> NPPF Para 27

## Strategic Geography

### Description/justification of the area

5. The Combined Authority area comprises the 3 unitary authority (UAs) areas of Bristol, Bath & NE Somerset, and South Gloucestershire. The population across the area is primarily focused on the city region of Bristol and Bath, together with a number of significant towns and an extensive range of villages. This area is brought together for strategic planning purposes by the West of England Combined Authority. This was established through the Devolution Deal signed with Government in 2017 which included a requirement to prepare a Spatial Development Strategy covering this geography.
6. The strategic geography for many cross-boundary matters also extends to include North Somerset, in a sub-region known as the West of England. This is an area over which there is a long history of joint working on planning matters reflecting the operation of the local economy and housing markets, as well as natural systems and infrastructure networks.
7. Beyond this, neighbouring authorities in Gloucestershire, the south of Wales, Wiltshire and Somerset are engaged through the plan making process to establish a wider area of co-operation, reflecting road and rail connections and other linkages that extend beyond the West of England, including the housing market relationships with (amongst others) Stroud and the towns to the west of Wiltshire.

**Figure 1: Area covered by Statement of Common Ground**



## Appendix 2: Strategic Planning Forum Membership, August 2021

<b>West of England Combined Authority</b>		
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
<b>Heads of Planning</b>		
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
<b>Infrastructure Providers</b>		
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
Alex Curd	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	Public Health England (WoE)
Ishani Kar Purkayastha	Consultant	Public Health England (WoE)
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
<b>Neighbouring Authorities</b>		
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*