

**Bath and North East Somerset Council
South Gloucestershire Council**

Bath and North East Somerset Local Plan Partial Update (Regulation 19 Draft Plan)

Statement of Common Ground

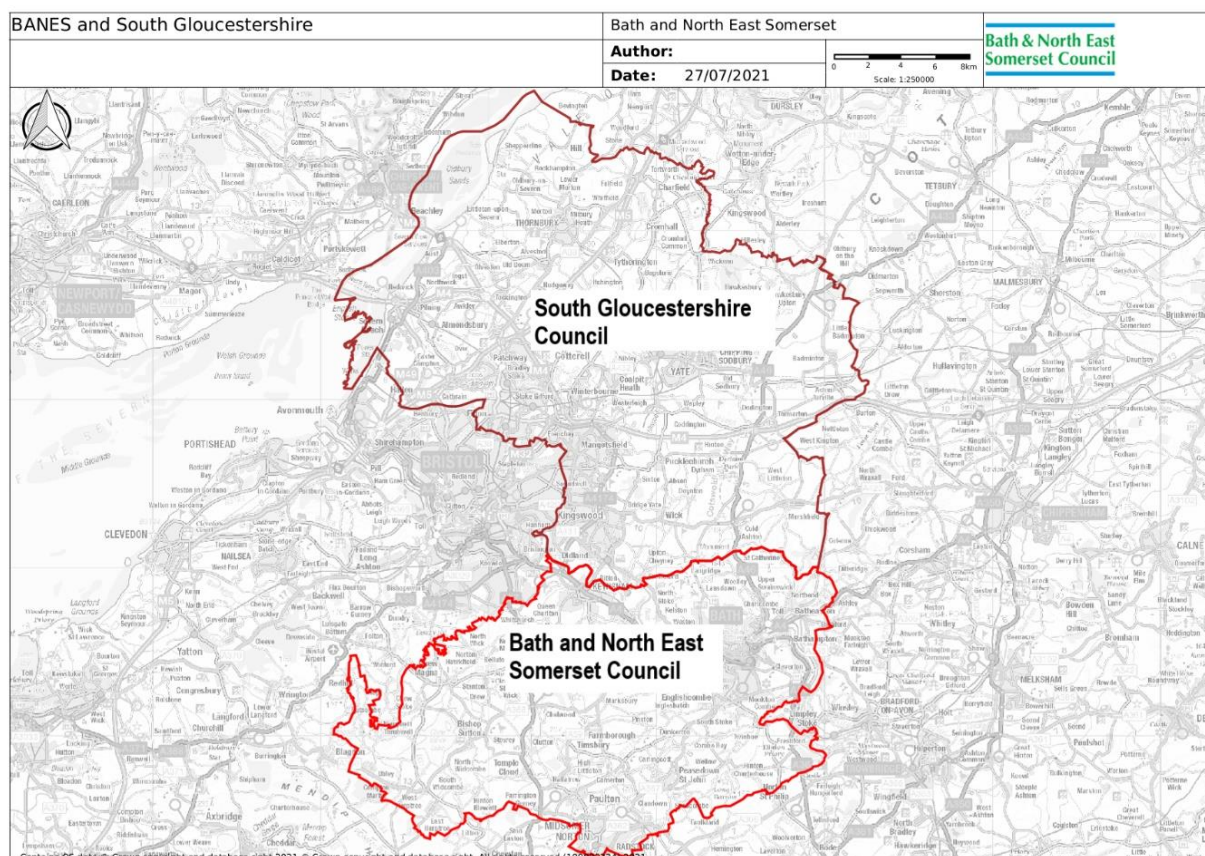
August 2021

**Bath & North East
Somerset Council**

Improving People's Lives

1. Introduction and Context

- 1.1 This statement of common ground is entered into between Bath & North East Somerset Council and South Gloucestershire Council (SGC) regarding the Bath and North East Somerset (B&NES) Council Local Plan Partial Update (LPPU). It includes details of liaison between the Local Authorities on strategic matters as relates to the LPPU that cross the boundary between the authorities as shown on the map below. Ongoing liaison is taking place with SGC on the West of England Combined Authority Spatial Development Strategy (which includes both the B&NES local authority area and South Gloucestershire local authority area), the new B&NES New Local Plan and the new South Gloucestershire Local Plan 2020.



- 1.2 B&NES Council and SGC are unitary authorities and there are environmental, transport, economic and housing links between the two administrative areas. The West of England Combined Authority (WECA) are currently drafting a Spatial Development Strategy (SDS); a high-level plan to support future development in the region, provide jobs, homes and transport links, in the right places and to deliver on the commitment to achieve carbon neutrality by 2030. The key objective of the SDS is for clean, inclusive recovery and growth for the region. The Strategy will cover the WECA area, comprising Bath & North East Somerset, Bristol and South Gloucestershire Councils.
- 1.3 In order to address a range of urgent issues in Bath and North East Somerset, including the climate and ecological emergency, B&NES Council is preparing a partial update of the Core Strategy and Placemaking Plan (which together comprise the Local Plan). As this is a partial update to the existing Plan, and not a new Plan,

the scope of the changes are confined to those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan and include: updating policies in order that they better address the climate and ecological emergencies, replenishing housing supply and addressing a limited range of other urgent local issues.

- 1.4 The current development plan documents (excluding waste and minerals and neighbourhood plans) for Bath and North East Somerset Council and South Gloucestershire Council comprise the following:

Bath & North East Somerset Council	South Gloucestershire Council
Bath and North East Somerset Placemaking Plan (July 2017)	South Gloucestershire Policies, Sites and Places Plan (November 2017)
Bath and North East Somerset Core Strategy (July 2014)	South Gloucestershire Core Strategy (December 2013)
Saved policies: Bath & North East Somerset Local Plan (2007)	

- 1.5 There was liaison between B&NES Council and SGC under the Duty to Cooperate as relates to the development of the B&NES Core Strategy and B&NES Placemaking Plan as evidenced by the B&NES examination documentation for the Core Strategy and Statement of Compliance with the Duty to Cooperate for the Placemaking Plan. There has been further liaison on South Gloucestershire Development Plans and more recently on the new South Gloucestershire Local Plan 2020. There is further ongoing liaison and collaborative working as relates to the development of the Spatial Development Strategy by the WECA.
- 1.6 A full review of the B&NES Local Plan will be undertaken (B&NES New Local Plan) alongside the West of England Combined Authority (WECA) Spatial Development Strategy (SDS) and this will need to take appropriate account of and address the strategic planning issues facing the wider Bristol sub-region. As set out above, South Gloucestershire Council are currently developing a new Local Plan for South Gloucestershire which will include a new strategy and policies to guide and manage growth and change in South Gloucestershire over the next 15 years and have consulted on Issues and Approaches.
- 1.7 The timetable for plan-making in the two authorities are set out in the authorities' published local development schemes and those in place at the time of writing are here: [B&NES Council LDS](#) and [South Gloucestershire Local Plan Delivery Programme](#)

2. Governance Arrangements

- 2.1 Cooperation in relation to strategic policy making takes place through planning and transport officers liaison and meetings. Details of liaison in respect of the B&NES LPPU and senior officers are set out below.

Local Authority	Name (lead contact)	Role
South Gloucestershire Council	Patrick Conroy	Strategic Planning Policy and Specialist Advice Manager
Bath & North East Somerset Council	Simon De Beer	Head of Planning
Bath & North East Somerset Council	Richard Daone	Deputy Head of Planning (Policy)
South Gloucestershire Council	Andy Whitehead	Transport & Environmental Policy Manager
Bath & North East Somerset Council	Claire Cornelius	Transport and Developments Manager

- 2.2 Record of main engagement activity

Last updated: 3 August 2021

Date	Activity log	Participation
8.1.21	Letter outlining scope of LPPU, consultation details and key areas for DtC engagement.	RD, PC
January 21	South Gloucestershire Council response to B&NES LPPU (Reg 18) consultation.	South Gloucestershire Strategic Planning Policy & Specialist Advice Team
27.1.21	B&NES Council and South Gloucestershire Council Planning Officers Meeting.	SDB, RD, PC (also Neil Best, B&NES and Carl McClure and Rob Levenston, South Gloucestershire)
4.5.21	B&NES Council and South Gloucestershire Council Transport Meeting to discuss transport evidence to the LPPU with South Gloucestershire Council.	CC, AW (also George Edwards, B&NES)
4.8.21	Consultation/liaison on Draft SoCG with South Gloucestershire Council Planning and Transport Officers.	PC, AW
25.8.21	Letter of engagement regarding consultation on the pre-submission Draft Plan under Reg 19. This will be followed up by means of a Planning Officers Meeting.	RD, PC

3. Strategic Planning Matters

- 3.1 Planning and Transport meetings provided the opportunity for B&NES Council to update on the B&NES Local Plan Partial Update and SGC to update on the development of the new South Gloucestershire Local Plan and to discuss opportunities for engagement in support of the Duty to Cooperate. There is ongoing liaison and joint working between the local authorities on the West of England Spatial Development Strategy, including opportunities for joint working/commissioning of evidence across the local authority areas.
- 3.2 In March 2019 B&NES Council declared a Climate Emergency, resolving to provide the leadership enabling the Bath and North East Somerset area to be carbon neutral by 2030. In July 2020 the Council declared an Ecological Emergency resolving to work with partners locally and regionally to drive coordinated leadership and collaborative action. SGC declared a climate emergency in July 2019 pledging to provide the leadership to enable South Gloucestershire to become carbon neutral by 2030, setting out 'This means that the global climate is in a state of breakdown and this is an emergency. We need to urgently prepare for the local impact of climate change, reduce our carbon emissions and protect and restore nature.'
- 3.3 The B&NES LPPU includes proposed policy amendments and new policy to support the climate and ecological emergency under the Responding to Climate Change, Nature Conservation and Green Infrastructure Chapters of the B&NES Local Plan. The Councils will look to continue to liaise on potential green infrastructure links and ecological networks between the local authority areas to support health and well-being of communities and nature recovery in further support of the climate and ecological emergency.
- 3.4 A Joint Green Infrastructure Strategy (JGIS) has been produced and endorsed by the West of England Combined Authority (WECA) and Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire Councils to support strategic working across the region. Further, the West of England Nature Partnership including B&NES and South Gloucestershire support cross-sector partnership working to restore the natural environment in the West of England through embedding the value of nature in decision making across spatial planning, public health and economic development.
- 3.5 Whilst the Partial Update does not look to update flood risk policies, SGC are keen to work together to understand the implications in terms of flood risk from development in proximity to the River Avon and look forward to continuing to work with B&NES and other partners to develop shared evidence in key areas, including the authorities' response to their respective Climate Emergencies and associated issues.
- 3.6 The purpose of the LPPU is to address urgent issues in B&NES in order to provide an up-to-date planning policy framework until such time as the new Local Plan is adopted in the context of and to deliver the WECA SDS. In relation to housing the LPPU will seek to replenish housing supply in order to ensure that the Adopted Core Strategy requirement can be met and an ongoing supply of housing maintained. The LPPU is not seeking to address longer term supply and sub-regional issues, which is the remit of the SDS and the new Local Plan. SGC are supportive of the LPPU approach.
- 3.7 It is proposed to take forward site allocations within the Partial Update to replenish B&NES housing supply. A key issue for discussion has been the proposed changes to the B&NES housing land supply with B&NES looking to identify an additional land

supply capable of accommodating around 1,200 new homes. In preparing the options for consultation, B&NES took account of previous discussions and South Gloucestershire's conclusion that it is not able accommodate any of the identified B&NES housing need.

- 3.8 In terms of additional housing land supply in B&NES, this is primarily proposed to be met through the allocation of mainly brownfield sites in Bath and Keynsham and includes allocating land to the east of Keynsham which was removed from the Green Belt and is currently safeguarded for development. The B&NES Low Carbon Travel Strategy is assessing/proposing enhanced walking and cycling routes from Keynsham into South Gloucestershire, including improved links to Longwell Green and Willsbridge. SGC understands and supports the rationale for focussing housing development on Keynsham, as a suitable location for sustainable growth. Related to this, SGC welcomes B&NES' commitment to achieving a shift towards more sustainable/ low carbon travel choices through the LPPU. This is particularly the case where it will result in improvements to infrastructure and connectivity in the local walking and cycling network and the improvements this will bring for communities by achieving better sustainable travel linkages between B&NES and South Gloucestershire.
- 3.9 As highlighted in SGC response to Reg 18 consultation on the LPPU, whilst B&NES and South Gloucestershire Councils are working closely together through the working arrangements associated with the WECA Spatial Development Strategy and as relates to the development of both local authorities new Local Plans, they are keen to continue to engage with B&NES as new evidence emerges relating to proposed development and transport infrastructure improvements at Keynsham to understand how proposals may affect communities and land within South Gloucestershire.
- 3.10 Proposed amendments to strategic and non-strategic industrial estates policies in the B&NES LPPU emphasise the importance of local employment opportunities to support the climate emergency and encouraging sustainable transport options such as walking and cycling to work across the district.
- 3.11 Proposed transport policy amendments within the B&NES LPPU reflect the Council's Climate and Ecological Emergencies and the ambition to achieve carbon neutrality by 2030. B&NES Council declared three priorities to achieve the carbon neutrality, including 'a major shift to mass transit, walking and cycling to reduce transport emissions.' Proposed policy amendments focus on sustainable travel, providing genuine travel choice and reducing car dependence, all supporting a reduction in carbon emissions. There is also an increased recognition of the importance of location and design in the sustainability of development.
- 3.12 B&NES Council and South Gloucestershire Council Transport Officers met to discuss the transport technical evidence base to the LPPU. It was agreed by all parties that the development proposed would not result in any unacceptable impacts on highway safety or give rise to any severe residual cumulative impacts on the road network, as per the requirements of national policy.

4. Statement Review and Update

- 4.1 This Statement of Common Ground is an iterative document, drafted at this stage for the purposes of the B&NES Local Plan Partial Update. Engagement and discussions will also inform the preparation of the Councils' respective Local Plans. This

engagement will be recorded in future iterations of the SoCG. While at this time there are no specific issues that cannot be agreed identified from the Partial Update, it will be important that discussion of cross boundary issues continue under the Duty to Cooperate and inform further development of the local authorities development plans.

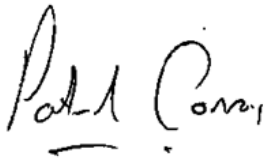
- 4.2 In the event that there are any changes in circumstances from those outlined in this SOCG, then these will be brought to the attention relevant officers and Members and any amendments will be agreed accordingly.

5. Signatories

5.1 This version of the statement of common ground is agreed on xxx date by Bath and North East Somerset Council and South Gloucestershire Council.

Signed  _____

Cllr Tim Ball, Cabinet Member for Planning and Licensing
On behalf of Bath and North East Somerset Council



24 August 2021

Signed _____

Patrick Conroy, Strategic Planning Policy and Specialist Advice Team Manager
On behalf of South Gloucestershire Council