



F.A.O. Patrick Conroy  
Strategic Planning Policy and Specialist  
Advice Manager  
South Gloucestershire Council

**Reply to** Simone Wilding  
**E-mail** Simone.Wilding@bristol.gov.uk  
**Date** 31 October 2023

Dear Patrick,

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

1. As mentioned in various informal co-operation meetings Bristol City Council is intending to progress with taking the Bristol Local Plan to the publication stage in November 2023. This letter seeks to formally outline our requests to consider matters under the duty to cooperate as they relate to strategic matters and in particular the approach to housing need.

2. Our authorities have been cooperating for many years with the ambition of setting a strategic framework upon which our new local plans will be based. In November 2017 we published a joint strategy (West of England Joint Spatial Plan) which represented our agreement to address development needs across our areas. Whilst the Joint Spatial Plan was withdrawn, the process of cooperation continued into the preparation for a Spatial Development Strategy (SDS) for the West of England Combined Authority, a process which also saw continued liaison with North Somerset Council. Following the halting of the SDS process in May 2022<sup>1</sup> we have continued to cooperate on cross boundary matters including our approach to commissioning cross boundary evidence.

3. As part of this we wrote to you in November 2022 setting out Bristol City Council's approach to the duty to cooperate. This included the first iteration of a Statement of Common Ground (developed jointly with Bath and North East Somerset Council and South Gloucestershire Council). The SoCG identified the key strategic matters for the WECA area.

### **Bristol's housing need**

4. We have all consistently agreed that strategic housing issues are matters which we should consider in cooperation, acknowledging the particular emphasis given to this in government policy and guidance and in the approach taken to local plan examinations.

---

<sup>1</sup> 'Work on the Spatial Development Strategy (SDS) has been halted and is not being progressed by the West of England Combined Authority. Metro Mayor Dan Norris has written to the Department for Levelling Up, Housing and Communities to explain that he has asked officers to stop work as unanimous agreement on the plan by the councils has not been reached.' [Spatial Development Strategy - West of England Combined Authority \(westofengland-ca.gov.uk\)](https://www.westofengland-ca.gov.uk)

5. The Government's standard method forms the starting point for determining housing need in Bristol. The 2023 standard method figure for Bristol comprises two elements:

- A locally derived need of **2,503** homes per annum, based on 2014-based population projections, with an additional allowance for inward migration and historic undersupply.
- An additional 35% cities and urban centres uplift, resulting in a total figure of **3,380** homes per annum. Applicable to the 20 largest cities and urban centres in England, the 35% uplift (which amounts to an additional 877 homes per annum) represents a contribution to national housing targets above and beyond the new homes that are needed locally.

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

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

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

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

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

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

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

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

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

12. The Government's national planning practice guidance (Housing and Economic Needs Assessment) states that the urban uplift is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations<sup>2</sup>. The recent consultation on proposed changes to the National Planning Policy Framework has further indicated that the government does not intend that urban uplifts are to be met in surrounding areas.

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

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

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

<b>578</b> homes per annum	<b>10,404</b> homes over plan period of 2022-2040
----------------------------	---

15. Taking the above housing-related matters into account, the city council requests that South Gloucestershire Council explores through its local plan process whether it could accommodate a proportion of Bristol's unmet locally derived housing need as set out above. A similar request is being made to Bath and North East Somerset Council and North Somerset Council.

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

---

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

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

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

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

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

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

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

### **Strategic Infrastructure**

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

22. As you are aware a strategic heat main for the heating network is being planned in South Gloucestershire and Bristol. The policies in the emerging Bristol Local Plan are geared towards the use of district heating as a principle means to secure energy efficient net zero development. It would be helpful to coordinate policy approach to the network across our local plans.

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

### **Conclusions**

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

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

26. The city council will also continue to liaise with South Gloucestershire Council in the preparation of a Statement of Common Ground, to be made available when the Bristol Local Plan is published. Consistent with national Planning Practice Guidance<sup>3</sup>, the statement will set out any agreement that has been achieved on strategic matters, along with outstanding matters which still need to be addressed and the process for reaching agreements on these. The statement will be updated periodically to ensure that it reflects the most up to date position in terms of joint working across the area.

I would be most grateful if you could acknowledge receipt of this letter.

Kind regards,

**Simone Wilding**

Chief Planner and Head of Planning

Encs: Draft Infrastructure Delivery Plan (attached to email)

---

<sup>3</sup> 'Plan-Making', Paragraph: 020 Reference ID: 61-020-20190315