

Dear Sir/Madam,

West of England Spatial Development Strategy: Duty to Cooperate

We, the West of England Combined Authority (hereafter known as the Combined Authority), are progressing a Spatial Development Strategy (SDS) for the West of England Region (including the Unitary Authorities of Bristol, Bath and North East Somerset, and South Gloucestershire). The SDS is a planning document and there is a legal requirement for the Combined Authority to produce this plan for the area. The SDS will contain a spatial strategy and strategic policies to address priorities for the development and use of land and will set the context for the three local authorities' Local Plans.

We are currently concluding our scenario appraisal work to understand how much and where growth for the Region should be accommodated. The scenario work has looked at the extent to which capacity is available in areas outside of green belt and in locations well served by public (and other forms of sustainable) transport (as per NPPF para 141:b).

Initial technical analysis indicates that the Region will be unable to meet the identified housing need (including affordable housing need) of approx. 105,000 homes over the 20-year period in a manner compatible with our strategic objectives without recourse to green belt. This accounts for our region's considerable constraints, including World Heritage sites, flood risk and international biodiversity designations, whilst also applying more ambitious density assumptions than are presently typically achieved (as per NPPF para 141:b).

We are therefore formally requesting confirmation, in accordance with NPPF Para. 141(c), as to whether you can accommodate some of the West of England (Combined Authority area) Regional housing need, including affordable housing need, within your area before we proceed with concluding our Green Belt 'exceptional circumstances' case.

Kind regards,

[Redacted]

Head of Regional Housing and Planning

West of England Combined Authority and Local Enterprise Partnership

[Redacted]

[Redacted]

W: westofengland-ca.gov.uk

A: 3 Rivergate, Temple Quay, Bristol, BS1 6EW



Twitter: @WestofEnglandCA LinkedIn: West-of-England-Combined-Authority



STROUD DISTRICT COUNCIL

Ebley Mill • Ebley Wharf • Stroud • Gloucestershire • GL5 4UB
01453 766321
www.stroud.gov.uk

██████████
Head of Regional Housing and Planning
West of England Combined Authority
3 Rivergate
Temple Quay
Bristol
BS1 6EW

EMAIL: ██████████
DIRECT DIAL: ██████████
OUR REF: ██████████

13 January 2022

Dear ██████████

Re: West of England Spatial Development Strategy: Duty to Cooperate

Thank you for your recent letter which I received on 20 December 2021.

Stroud District Council acknowledges and understands the process that the West of England Combined Authority (WECA) is going through in the preparation of a Spatial Development Strategy (SDS) for the West of England Region. The District Council is cooperating with the Combined Authority and with South Gloucestershire Council on an ongoing basis on strategic planning and cross boundary matters and will continue to do so.

Stroud District Council submitted a Draft Local Plan to the Planning Inspectorate in October 2021 for examination. As part of that process, the District Council agreed a Statement of Common Ground with South Gloucestershire Council which states that:

“...In the West of England Strategic Planning Forum the Combined Authority have indicated that the scale of need is extremely challenging in terms of both constraints and deliverability in the West of England, and they cannot therefore rule out that discussions on unmet need will need to take place. Such discussions if needed would be likely timed towards the end of 2021. (paragraph 3.6)

The parties agree to continue to work together to understand how the housing needs arising from within the WECA area should be accommodated.” (paragraph 3.7)

The parties agree to engage proactively and positively on ongoing strategic planning and transport matters relating to the Stroud District Local Plan and the emerging WECA SDS and SGLP. (paragraph 3.35)

Chief Executive: ██████████

Consequently, Stroud District Council is happy to engage pro-actively with WECA to understand the capacity evidence which sits behind the scenario work and to work with WECA and other adjoining authorities to understand how future needs could be accommodated.

In terms of the emerging Stroud District Local Plan, which is currently at examination, the Plan provides for a substantial uplift in future housing numbers within the District (at least 630 homes per year), compared with the current adopted Local Plan (at least 456 homes per year) and also includes a site for 3,000 dwellings to address the unmet needs from neighbouring Gloucester. The Plan also allocates 79 hectares of land for further employment land to meet local needs.

Whilst there is physical capacity within the District for additional development, there are substantial policy and physical constraints relating to the Cotswolds AONB (which covers just over 50% of the District's total land area) and, outside of that area, extensive areas of land liable to flood adjacent to the Severn Estuary a designated internationally important wildlife site. Whilst there is an established network of market towns and larger villages within the District, the need to promote sustainable patterns of development limits the options for contributing significantly to wider regional needs due to the absence of major cities and larger towns which offer the best opportunities for self-containment and benefit from a significant and mature public transport network.

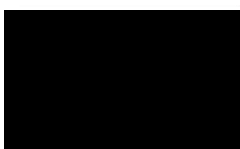
With specific regard to the southern part of the District adjoining South Gloucestershire, it should also be noted that the development proposed in the emerging District Local Plan is likely to have an impact on the strategic highway network, particularly at motorway M5 Junction 14 and adjacent roads, to the extent that South Gloucestershire Council has asked for further investigation and more detailed proposals for mitigation. Whilst comprehensive transportation and infrastructure investment within the area may unlock further growth opportunities in the future, this is beyond the scope of the emerging District Local Plan at the current time.

In summary, the District Council understands the strategic planning process WECA is going through and is happy to engage pro-actively to understand the capacity evidence and how future needs arising from within the WECA area could be accommodated. However, there are a number of policy and physical constraints within Stroud District which make a significant contribution to meeting wider regional needs unlikely within the short to medium term, and in the longer term would require significant infrastructure planning and investment.

Whilst the District Council is happy to explore the potential longer term opportunities further with WECA, other options to meet the needs arising from within the WECA area, including exploring the Green Belt 'exceptional circumstances' case, may be more appropriate in terms of promoting the most sustainable forms of development within short to medium term timescales.

I hope this is a helpful contribution to the WECA debate and Stroud District Council looks forward to continuing its work with WECA and, in particular, with South Gloucestershire Council, on strategic planning and cross boundary matters.

Yours sincerely,



Head of Planning Strategy and Economic Development