

# Duty to co-operate

## Statement of common ground



## Pre-commencement document to Challenges: July 2020

### Introduction

1. The duty to cooperate was introduced by the Localism Act 2011. It places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation relating to strategic cross boundary matters.
2. Guidance on how this is to be implemented is contained in the National Planning Policy Framework (2019). The relevant paragraphs are set out below:

### *Maintaining effective cooperation*

*24. Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.*

*25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).*

*26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.*

*27. In order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made*

*publicly available throughout the plan-making process to provide transparency.*

3. This statement of common ground is a written record of the progress made by North Somerset during the process of planning for strategic cross-boundary matters. It documents where effective co-operation has taken place throughout the plan-making process and that the duty to co-operate has been complied with. It will help to demonstrate at examination that the Local Plan is deliverable over the plan period in terms of reflecting effective joint working across local authority boundaries. The document will be regularly updated.
4. The purpose of the document is not to document every occasion that North Somerset meets with or consults other local authorities or bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or, for example, links to relevant evidence.

### **Content and purpose of the statement of common ground**

5. The National Planning Policy Guidance states that the Statement of Common Ground is expected to contain the following:
  - a. A short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);*
  - b. The key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;*
  - c. The plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);*
  - d. Governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;*
  - e. If applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;*
  - f. Distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;*
  - g. A record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and*
  - h. Any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.*
6. The purpose of the document is to capture the actions taken when addressing strategic cross-boundary matters through the duty to co-operate. The National Planning Policy Guidance indicates that these will include (but are not limited to):
  - working together at the outset of plan-making to identify cross-boundary matters which will need addressing;
  - producing or commissioning joint research and evidence to address cross-boundary matters;
  - assessing impacts of emerging policies; and
  - preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated, (such as the distribution of unmet needs).



7. Effective cooperation enables strategic policy-making authorities and infrastructure providers to establish whether additional strategic cross-boundary infrastructure is required. The statement is evidence that the strategic policy-making authorities have sought agreement with the relevant bodies.

### Strategic matters

8. The Planning and Compulsory Purchase Act 2004 defines 'strategic matters' for the purposes of the duty to cooperate as:

*Sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.*

9. The NPPF sets out the strategic policy areas which are expected to be included in local plans (paragraphs 20/21):

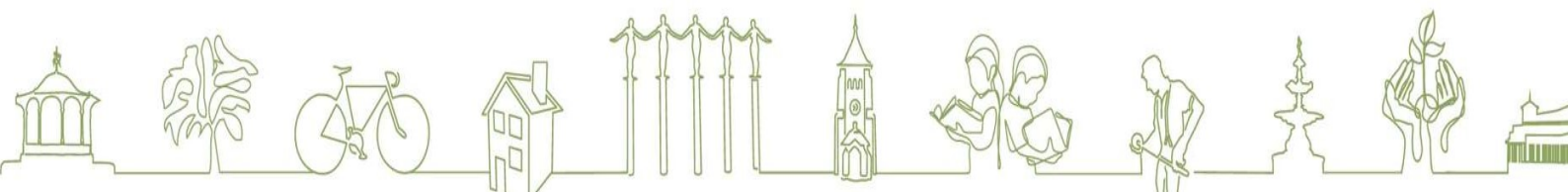
*20. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- c) community facilities (such as health, education and cultural infrastructure); and*
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

### Parties involved

10. The North Somerset duty to co-operate process categorises the bodies involved as:

- Local authorities: these are the neighbouring local planning authorities and the West of England Combined Authority.
- Prescribed bodies: These are the bodies prescribed in the regulations (Town and Country Planning (Local Planning) (England) Regulations 2012) plus the Local Enterprise Partnerships and Local Nature Partnerships which are not subject to the requirements of the duty, but local planning authorities in England, and prescribed public bodies must cooperate with them.
- Additional bodies: Other organisations involved in strategic issues and engaged with through the duty to co-operate. These bodies may only be involved in specific issues and may change over the course of the plan-making process and depending on the nature of the strategic issues identified.

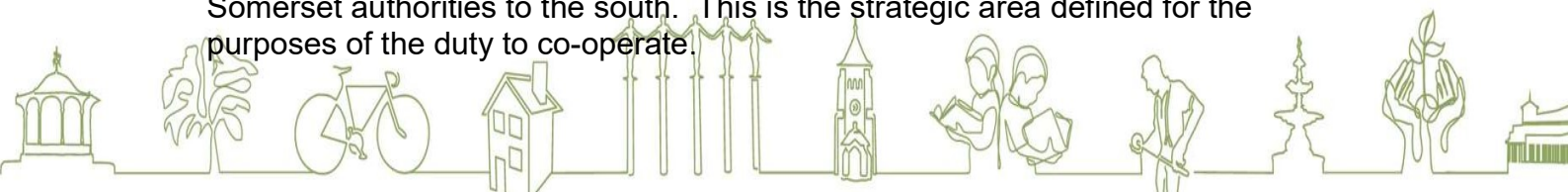


Local authorities	Prescribed bodies	Additional bodies
West of England Combined Authority	Environment Agency	NHS Bristol, North Somerset & South Gloucestershire CCG
Bristol City Council	Historic England	Network Rail
Bath and NE Somerset Council	Natural England	National Grid (gas)
Sedgemoor District Council	Civil Aviation Authority	National Grid (electricity)
Mendip District Council	Homes England	Bristol Water
Somerset County Council	Clinical Commissioning Groups	Water:  Lower Axe Internal Drainage Board  North Somerset Levels Internal Drainage Board  Bristol Avon Catchment Partnership  Independent Water Networks Ltd
	Office of Rail Regulation	Wessex Water
	Highways England	Telecommunications:  UK Broadband Limited  Mobile Operators Association  Triangle Telecom
	Marine Management Organisation	The Coal Authority
	Local Enterprise Partnerships:  West of England Local Enterprise Partnership  Heart of the South West Local Enterprise Partnership	Mendip Hills AONB unit
	West of England Local Nature Partnerships	South West Local Aggregates Working Party

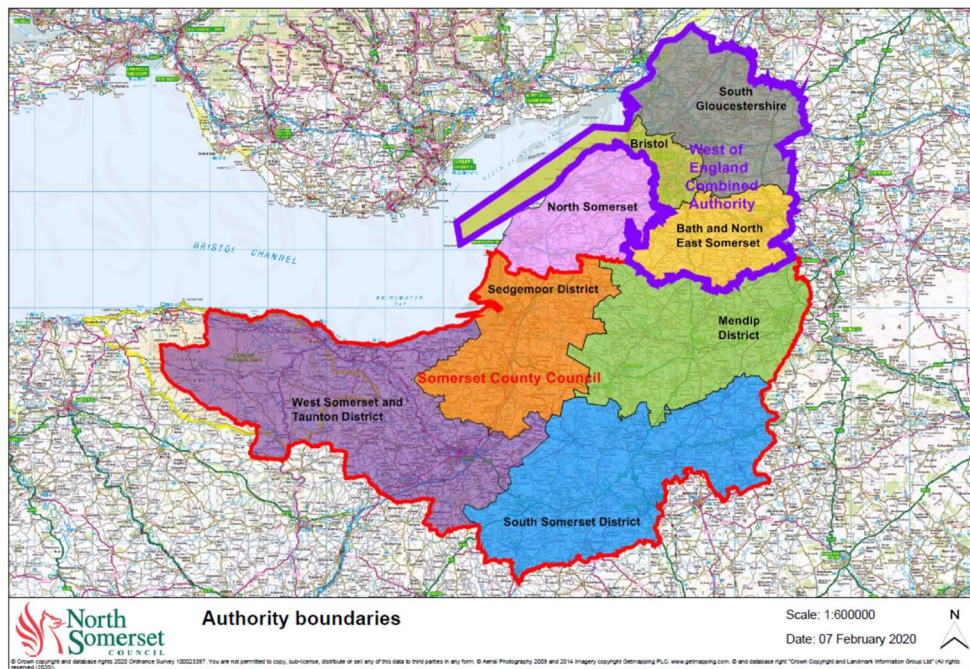
11. North Somerset has always worked closely with neighbouring authorities on strategic issues. In particular, there is a close working arrangement with the West of England and existing governance structures are in place to facilitate duty to co-operate discussions. While with Somerset the arrangements are less formalised there have been strategic duty to co-operate discussions particularly in relation to the Sedgemoor Local Plan and the Joint Spatial Plan.

### Strategic geography

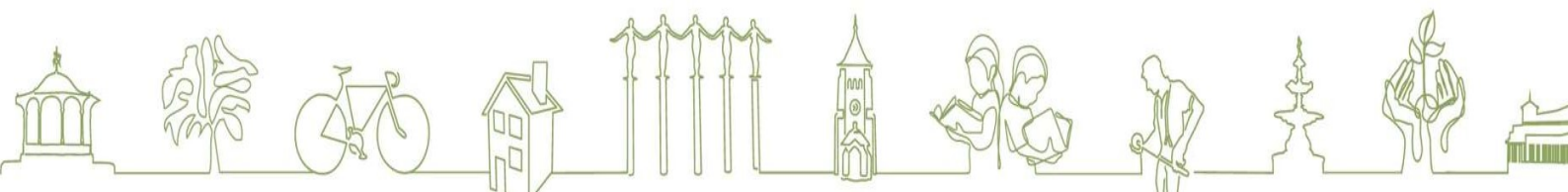
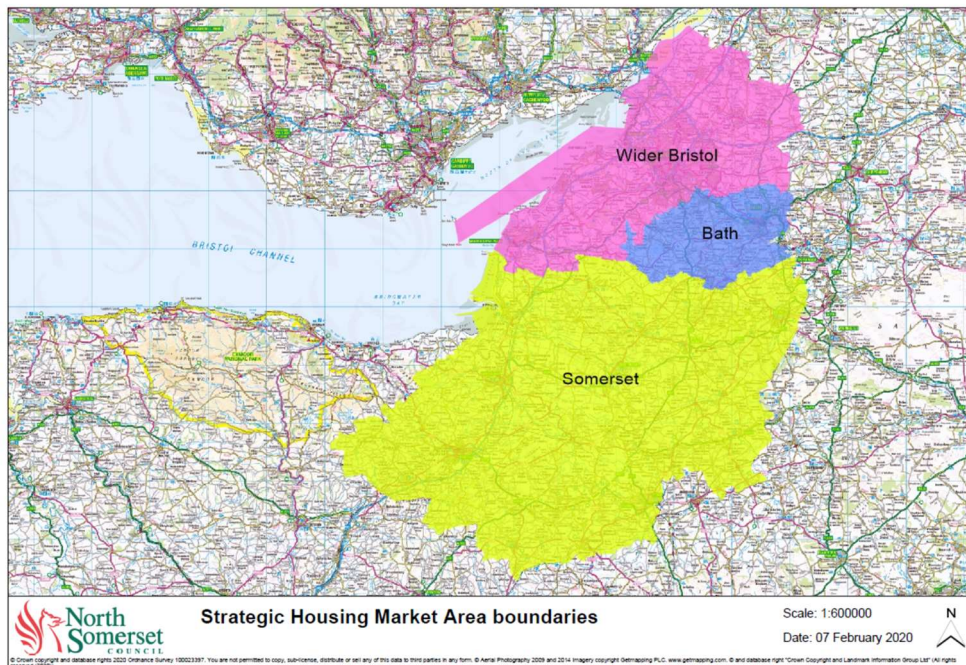
12. The geography of the wider region within which North Somerset sits is shown on the following map. This shows WECA authorities to the north and Somerset authorities to the south. This is the strategic area defined for the purposes of the duty to co-operate.





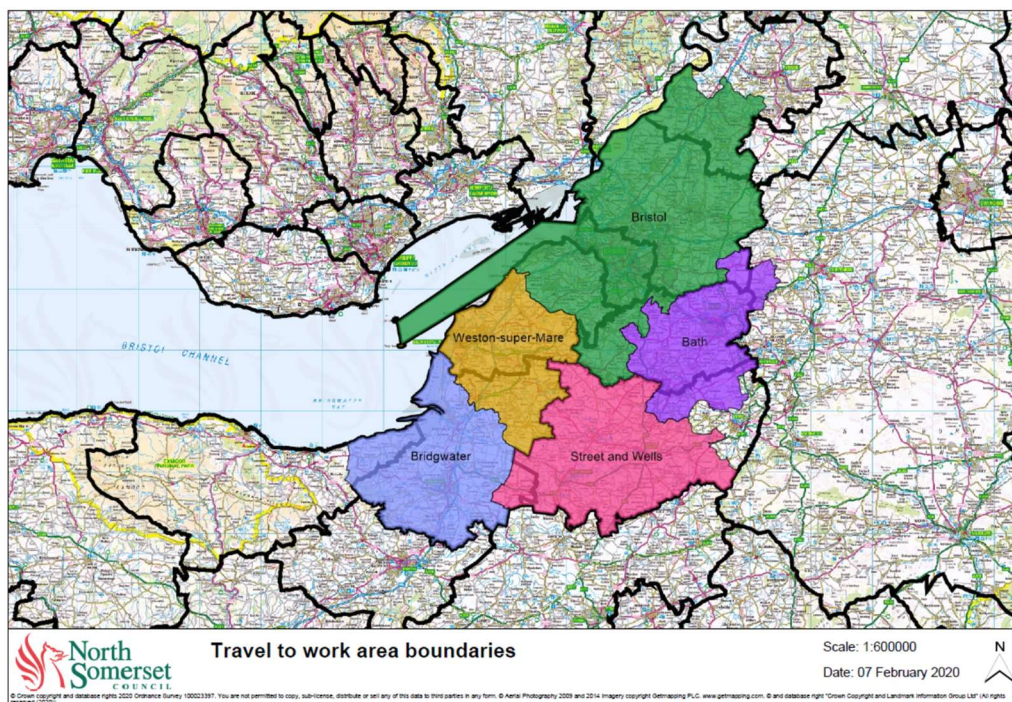


13. North Somerset, Bristol City and South Gloucestershire together make up the wider Bristol Housing Market Area. Mendip, Sedgemoor, South Somerset and Taunton Deane have a separate Housing Market Area, as does Bath.

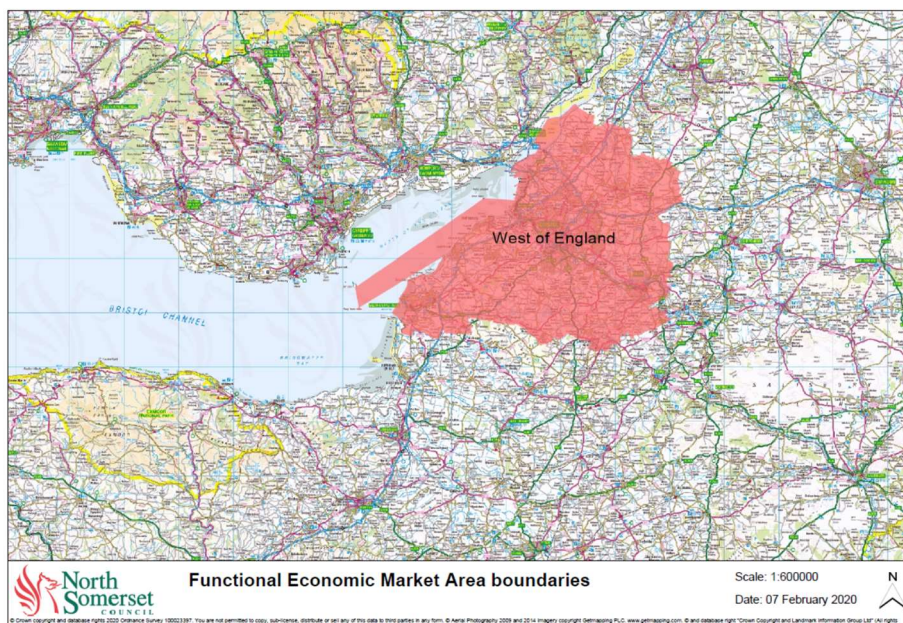




14. There are two Travel to Work Areas affecting North Somerset: Weston-super-Mare and Bristol. The Weston Travel to Work area extends southwards into Sedgemoor.



15. North Somerset, Bristol City, South Gloucestershire and Bath and North East Somerset together comprise the west of England Functional Economic Market Area.



16. The strategic planning area for the North Somerset Local Plan Statement of Common Ground is widely drawn and in addition to including the neighbouring authorities of Bristol, B&NES, Sedgemoor and Mendip District Councils, includes the WECA and Somerset County Council areas. These together



cover the areas affected by the principal cross-boundary issues, particularly those relating to housing, employment and infrastructure.

### **June 2020: Initial duty to co-operate letter**

17. The North Somerset Local Plan 2038 was launched in March 2020 with a Pre-commencement document. In respect of the duty to co-operate at this early stage in the plan-making focus the emphasis is on identifying the bodies to be involved in the duty to co-operate process and identifying the strategic issues with cross boundary implications.
18. An initial letter was sent out to the relevant organisations on 11 June 2020 (Appendix A) requesting information on development plan timetables, strategic matters, evidence and governance. At this early stage of the plan-making process the emphasis was on identifying the relevant strategic matters and those bodies which needed to be part of the duty to co-operate process. The information would also help to understand what evidence is available and where the gaps were and any potential timetabling issues related to plan production.
19. The questions asked were:

#### *Development plan timetable*

*For local planning authorities, what development plan documents are you preparing which we will need to take into account? Please provide a timetable and any relevant information at this stage, including in respect of adopted plans, target dates for review and monitoring.*

#### *Strategic matters*

*Are these the strategic matters with cross-boundary implications of relevance to North Somerset? Are there any others? Which are the cross-boundary matters with North Somerset affecting your authority or organisation?*

#### *Evidence*

*What evidence do you have, is proposed, or could be developed jointly which is relevant to assessing the strategic issues identified? What is the scope for alignment with existing or proposed studies?*

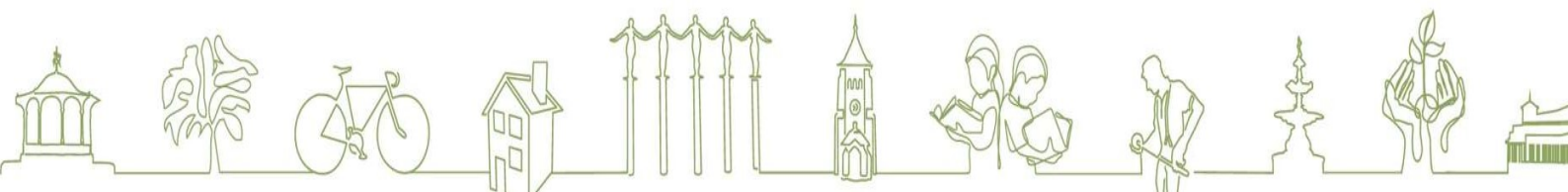
#### *Governance*

*How would your authority or organisation wish to engage with duty to co-operate issues and at what level?*

A summary of the responses received is contained in Appendix B. The overall response is summarised below.

### **Development plan timetables**

20. The current development plan timetables with respect to the plan-making process are summarised as follows. This will be kept under review.





21. WECA is producing a Spatial Development Strategy which will subsequently form the strategic context for the Bristol and B&NES local plans. B&NES is producing a Partial Local Plan Review.

Local planning authority	Proposed start of plan/ review	Reg18 consultation	Reg19 consultation/ SDS consultation	Target submission date	Target adoption
North Somerset	2020	2021	2022	2022	2023
Sedgemoor	October 2020	Nov 2021- May 2022	August – October 2022	January 2023	December 2023
Mendip	July 2020	TBC	TBC	TBC	TBC
Bristol	2020	2021	2022	2023	2023
B&NES	April 2020	Nov/Dec 2020	June/July 2021	September 2021	April 2022
WECA	June 2020	N/A	Summer 2021	February 2022	Summer 2023

22. There is currently a good deal of alignment between the various development plan processes with all authorities currently at the start of a new plan or plan review cycle which should assist in the co-ordination of the duty to co-operate process. In addition, Somerset County Council is working on a Minerals and Waste Development Scheme although this is at an early stage.
23. Although not development plans, the response received also highlighted other documents such as the Mendip Hills AONB Management Plan and the DfT Road Investment Strategy as being of relevance. These and other plans and strategies will need to be considered where they have implications for duty to co-operate issues.

### Strategic matters

24. The initial assessment of the potential strategic matters based on consultation with duty to co-operate partners is set out below, along with an early indication of existing evidence sources and where additional evidence may be required and how this might be produced. The strategic matters will be kept under review as plan-making progresses, particularly as the preferred spatial strategy and strategic policies are developed, and the process for how relevant issues will be addressed identified.

Strategic matter	Evidence	Comment
Housing (quantum of housing, locations adjacent borders, unmet needs, affordable housing, Gypsy and Traveller issues)	NSC is jointly commissioning a WoE Local Housing Needs Assessment which includes affordable housing and Gypsy and Traveller needs. NSC preparing updated SHLAA alongside WoE UAs with common methodology.	Need to consider outputs of LHNA to identify any potential issues with cross-boundary implications. Issues such as relating to the spatial strategy and unmet needs will be considered as plan-making process develops. Opportunity to align processes.
Green Belt	Worked jointly on WoE GB Appraisal.	Will continue to share approach to detailed GB assessment to ensure consistency.
Employment needs (travel to work, commuting flows, strategic locations, implications)	NSC is jointly commissioning a WoE Employment Land Strategic Needs Assessment.	Need to consider outputs of ELSNA to identify any potential issues with cross-boundary





of Airport, Port, Hinkley Point C).	WoE Local Industrial Strategy. HoSW LEP area Employment Land Study.	implications. May be issues around role of Airport, Port and Hinkley Point.
Retail and leisure	ELSNA will consider employment issues related to retail. Bristol undertaking retail and leisure study.	No strategic issues with cross-boundary implications identified but will be kept under review.
Other commercial development		No strategic issues with cross-boundary implications identified.
Infrastructure for transport	NSC is part of the WoE Joint Local Transport Plan. Highways England have detailed model of M5 J19 and looking to develop similar for J21, and will consider J20.	There will be cross-boundary implications in terms of particularly WoE but also with Somerset and in respect of rail. Potential to commission joint transport studies as plan making progresses. Need to consider M5 in terms of junction capacity and seasonal flows, and also potential mitigations in relation to Bristol Airport.
Other infrastructure	Hinkley Point C Connection project.	Connection project has cross-boundary issues. Need to keep other infrastructure issues under review.
Waste management	ELSNA includes employment issues related to waste.	No specific strategic issues with cross-boundary implications identified but needs to be kept under review. Somerset CC identified waste as a potential issue.
Water supply and wastewater		No strategic issues with cross-boundary implications identified.
Flood risk and coastal change management	NSC SFRA updated.	Need to work with EA in particular in identifying any potential cross-boundary implications. Potential for joint working on SRFA.
Minerals	NSC works with WoE UAs and SW LAWP to collect evidence. Worked with Somerset authorities on energy minerals – topic paper and MoU in respect of fracking issues agreed.	Need to consider any cross-boundary implications.
Energy	Joint working with SGC and B&NES to prepare Renewable Energy Resource Assessment. WoE joint evidence on zero carbon buildings.	Need to consider any cross-boundary implications.
Community facilities		No strategic issues with cross-boundary implications identified.
Conservation and enhancement of the natural environment, ecology, landscapes and green infrastructure	Monitoring Environmental Outcomes in Protected Landscapes – data collected by NE. Nature Recovery Plans and WoE Nature Recovery Network. Joint WoE GI Strategy. WENP have mapped ecosystem services and access to green spaces in WoE and have commissioned a WoE tree and woodland	Need to consider any cross-boundary implications such as where key habitats are functionally connected across borders. May need alignment on policies for AONB. AONB unit suggest issues such as views, dark skies and tranquillity may need to be considered. NE suggest there



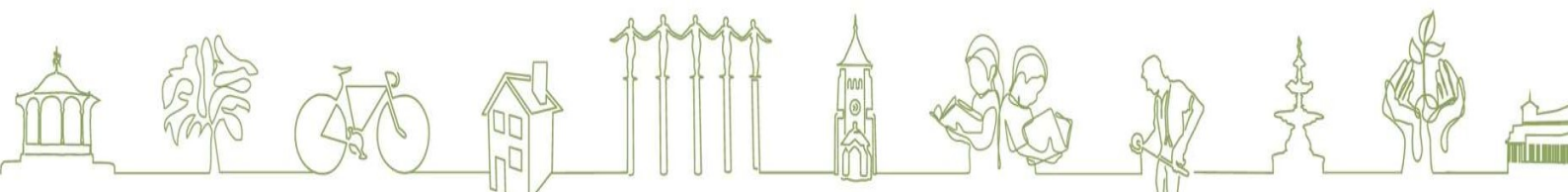
	strategy. District licensing for great crested newts and NE exploring other options.	may be issues related to coastal squeeze.
Historic and built environment		English Heritage note that historic landscapes and heritage assets may cover large areas and have cross-boundary implications. Need to consider what these might be.
Climate emergency		No strategic issues with cross-boundary implications identified but opportunity to align policy approaches and share best practice.
Strategic planning process	Working with WECA/WoE UAs to share approaches to, for example, SA.	Opportunity to discuss emerging work, share best practice and align approaches.
Air quality		Raised through consultation but no strategic cross-boundary issues identified.
Placemaking and design	WOE placemaking charter.	Raised through consultation but no strategic cross-boundary issues identified, but opportunity to share best practice.

## Governance

25. North Somerset will identify appropriate governance arrangements with all neighbouring authorities and bodies. Where there are issues that affect more than one area it is expected that the duty to co-operate process would operate jointly, such as engagement with the West of England or Somerset authorities. In many cases there will be opportunities to use existing governance structures and forums which operate at officer and member levels. Arrangements will be identified for preparing and keeping the statement of common ground up-to-date.

## Next Steps

26. This is just the start of a lengthy process of plan preparation and one which could see the role of partners, issues and ways of working change over time. North Somerset will develop a programme for working with the identified organisations through the duty to co-operate, to clarify the strategic matters and refine ways of working more effectively. As the local plan develops through Challenges, Choices and the development of spatial options and strategic policies, this duty to co-operate process will help to ensure that strategic issues across the sub-region are better understood, and which in turn will support the delivery of sustainable development.



## Appendix A

### North Somerset Duty to Co-operate letter 11 June 2020

#### North Somerset Local Plan 2023-2038

North Somerset is preparing a local plan for the 15 year period 2023-2038. As part of the plan-making process we are committed to effective and ongoing engagement with neighbouring authorities and other bodies on strategic cross-boundary issues through the duty to co-operate. We are writing to you at the beginning of our new local plan process to agree the principles and mechanisms for undertaking effective engagement and ensuring that our strategic policies are aligned.

As required by the National Planning Policy Framework, we will be maintaining one or more statements of common ground to document the approach as we progress through the plan making process. The initial statement(s) of common ground will be published once the area it covers has been agreed, the governance arrangements for the co-operation process defined, the substantive strategic matters to be addressed determined and which bodies will be involved and how. The document will be published on the website.

The purpose of this letter is to scope out the duty to co-operate process by identifying the strategic issues which need to be addressed and the authorities and bodies which need to be involved. This is just the start of the duty to co-operate process associated with the North Somerset Local Plan and the issues identified and participants may change as plan-making progresses. The responses received will help us to shape the most effective ways of engaging on these matters.

It would be appreciated if you could structure your response in relation to the following topics and questions. Please can you respond by **26 June 2020**.

#### 1. Development plan timetable

The North Somerset Local Plan will cover the period 2023-2038. The proposed timetable is currently as follows:

Pre-commencement document	March 2020
Consultation on 'challenges'	Summer 2020
Consultation on 'choices'	Autumn 2020
Consultation on Draft Plan	Autumn 2021
Publication version.	2022
Submission	2022
Examination	2023
Adoption	2023





**Question:**

For local planning authorities, what development plan documents are you preparing which we will need to take into account? Please provide a timetable and any relevant information at this stage, including in respect of adopted plans, target dates for review and monitoring.

## 2. Strategic matters

The duty to co-operate relates to strategic matters with cross-boundary implications. At the start of the process we need to scope out what these are. National Planning Policy Framework paragraph 20 lists the strategic policy areas. The following lists those strategic matters with potential cross-boundary implications specifically identified as affecting North Somerset.

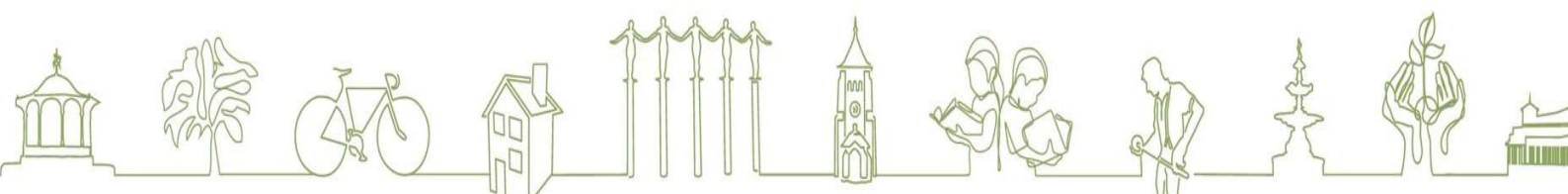
Housing	The quantum of housing, strategic locations adjacent to boundaries, any unmet needs; affordable housing; gypsy and traveller provision.
Employment	Travel to work, commuting flows, location of new employment development; implications of development at the Port, Airport, Hinkley Point.
Infrastructure	Transport, flood, community infrastructure with cross-boundary implications.
Minerals	Aggregates.
Green infrastructure	Ecological, landscape and habitat considerations impacting on cross-boundary issues.
Development locations	Aligning strategic policies and cross-border allocations.

**Question:**

Are these the strategic matters with cross-boundary implications of relevance to North Somerset? Are there any others? Which are the cross-boundary matters with North Somerset affecting your authority or organisation?

## 3. Evidence

Plan-making requires an up-to-date evidence base. North Somerset is working jointly with the WECA and the WECA UAs to commission a Local Housing Needs Assessment and an Employment Land and Spatial Needs Assessment and will be collaborating on other workstreams.



Question:

What evidence do you have, is proposed, or could be developed jointly which is relevant to assessing the strategic issues identified? What is the scope for alignment with existing or proposed studies?

#### 4. Governance

The duty to co-operate will involve joint working at different levels, and there already exist a wide range of forums addressing many of the key strategic issues. Within North Somerset the process and outcomes will be agreed through the officer Driving Growth Board which oversees the local plan process and with member sign off by the Executive Member for Planning. We would like to establish an appropriate forum for undertaking the duty to co-operate discussions and would like your views on how this might operate. For some issues this could involve a combination of authorities and/or organisations; for others it would operate more effectively on a one-to-one basis.

Question:

How would your authority or organisation wish to engage with duty to co-operate issues and at what level?

We look forward to working with you through the identification of cross-boundary issues and working together to address the implications throughout the plan-making process. If you have any questions or would like to discuss the North Somerset Local Plan and the duty to co-operate implications, please contact Michael Reep, Planning Policy Manager.



## Appendix B

### Summary of responses to June 2020 letter

Organisation	Summary of comments received
<b>Neighbouring authorities</b>	
West of England Combined Authority	<p>Thank you for your letter of 11 June 2020 regarding Duty to Cooperate on the North Somerset Local Plan and the invitation to work with you to identify and address the strategic and cross-boundary issues to be addressed through the plan.</p> <p>We welcome the recent commitment (in the MOU signed on 19th June) between ourselves and the 4 West of England unitary authorities including yourselves to work together on strategic planning to tackle the challenges the region faces in order to best support clean and inclusive recovery and growth across the region.</p> <p>In response to the specific questions raised in your letter, WECA's position is set out below:</p> <p><u>1. Timetable:</u></p> <p>WECA and its constituent authorities agreed on 19 June 2020 to commence preparation of a Spatial Development Strategy, which will cover Bath &amp; North East Somerset, Bristol and South Gloucestershire authority areas. The anticipated timescale for the plan's delivery is outlined in the main report.</p> <p>As noted in the recent MOU signed by all authorities including NSC, in respect of the SDS and NSC Local Plan, it is important that timescales are sufficiently aligned so that respective plan-making processes can take account of each other.</p> <p><u>2. Strategic Matters:</u></p> <p>WECA agrees that North Somerset Council have identified the key strategic matters with cross-boundary implications and recognises that the detail of these issues will be understood further through the plan making process. All of the issues highlighted in the letter (with the exception of minerals) are relevant to WECA as a plan-making body and</p>





transport authority. Further to the issues as set out by North Somerset Council, WECA suggest the following issues should also be considered through joint working:

- Infrastructure should include energy and water resources in its scope, as the distribution of these assets is uneven across the West of England and the networks that support them are cross boundary in nature.
- Employment related issues should also consider the management of existing strategic employment areas. This would include waste management locations and key retail centres which may have cross-boundary impacts in the future.
- WECA authorities are working with North Somerset Council to develop a Placemaking Charter and support high quality design as a region. The agreed benefit of joint working on this agenda could be emphasised by considering design quality as a strategic matter through the Local Plan.
- Whilst the adaptation and mitigation of climate change will be a running theme through all strategic issues (eg transport infrastructure, housing, green infrastructure), WECA and North Somerset will benefit from continued joint working on climate change as a strategic issue to achieve our joint ambition of carbon neutrality by 2030.
- WECA would also seek to ensure that air quality is recognised within the scope of strategic matters, particularly in relation to strategic and cross-boundary transport infrastructure.
- Green belt - it is noted that green belt reviews are intertwined with work on housing availability and capacity and may need to be discussed on an equivalent cross boundary basis in due course.

### 3. Evidence

The West of England Joint Committee agreed in January 2020 to jointly commission strategic evidence to inform plan-making across the West of England. North Somerset have been fully engaged in the development and delivery of these evidence base commissions, many of which are joint or otherwise aligned, through our existing cross-boundary officer meetings.

### 4. Governance

The West of England authorities (including North Somerset and WECA) have established processes and governance for joint working on strategic planning, housing and transport issues. Through these processes, we are well placed to manage joint working (including the formal Duty to Cooperate process) for the North Somerset Local Plan as well as the WECA Area Spatial Development Strategy (SDS) and the Local Plans for its constituent authorities. This reflects,




	<p>amongst other things, the Functional Economic Market Area and Housing Market Areas – we note that the Bristol Housing Market Area covers North Somerset, South Gloucestershire and Bristol.</p> <p>It is noted that WECA and North Somerset engage through a series of weekly, monthly and quarterly meetings at which strategic planning (and transport planning) are discussed and decisions taken through the agreed governance as required. It is suggested that discussions continue through these forums, with decisions made at the appropriate level based on technical recommendations. It is noted that many of these decisions will also be documented through the WECA-area Duty to Cooperate and Statement of Common Ground, which is currently in development with involvement from North Somerset Council. As such we would expect South Gloucestershire to be formally invited to partake in relevant Duty to Cooperate discussions affecting the WECA area going forward.</p>
Bristol City Council	<p>As we address the economic situation arising from the pandemic, tackle the need for new and affordable homes, and respond to the challenges of climate change and the ecological emergency, we look forward to working cooperatively with North Somerset Council in addressing these issues which set the context for policy development in our areas. Your letter helpfully sets out the likely strategic topics with cross boundary implications. Our observations are set out below, using the template provided by your letter.</p> <p><u>Q1. Development plan timetable</u></p> <p>Bristol City Council is preparing a new local plan which will be in general conformity with the West of England Combined Authority Spatial Development Strategy. As you are aware our local plan review began in 2017 and the process is continuing taking into account the changed strategic planning context. The broad timetable for the local plan is as follows:</p> <ul style="list-style-type: none"> <li>• 2020: New studies and evidence. Call for sites continues.</li> <li>• 2021: Consultation on issues and options for development (Regulation 18).</li> <li>• 2022: Publication version to be approved and made available for comment (Regulation 19).</li> <li>• 2023: Examination by planning inspector. New local plan to be adopted (Autumn 2023).</li> </ul> <p><u>Q2. Strategic matters</u></p>

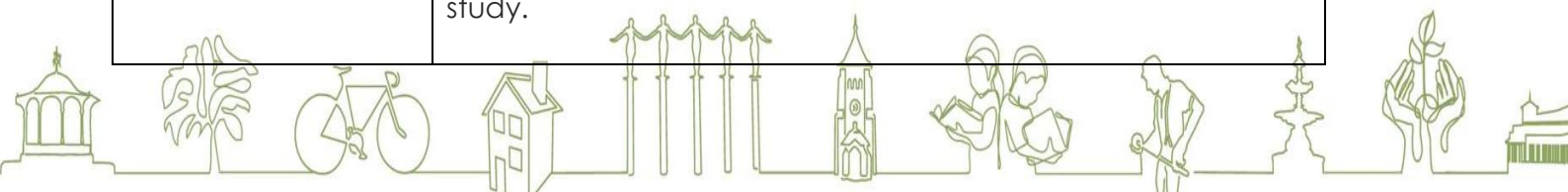


		<i>Minerals</i>	<i>Aggregates.</i>	Matters in relation to minerals will be addressed through South West
		<i>Green infrastructure</i>	<i>Ecological, landscape and habitat considerations impacting on cross-boundary issues.</i>	It is agreed that these are green infrastructure matters with potential cross boundary implications. There is likely to
		<i>Development locations</i>	<i>Aligning strategic policies and cross-border allocations.</i>	It is agreed that alignment of these matters is a cross boundary concern, particularly in the event of any cross boundary allocations that might arise. It is noted that any
	Future growth and change in the context of both the climate emergency and the ecological emergency will be relevant matters for consideration. This is strand which forms a golden thread running through a range of development issues which impact on our areas.			
	In addition to the matters raised above, evidence may indicate additional cross boundary strategic matters that are appropriate to consider throughout the development plan preparation process.			

Q3. Evidence

The West of England authorities are working jointly with the WECA to commission a Local Housing Needs Assessment and an Employment Land and Spatial Needs Assessment and will be collaborating on other work streams. Bristol City Council has commissioned a gipsy and traveller and travelling showpeople needs assessment which is due to be completed shortly. We have commissioned a Bristol City Centre Retail and Leisure Study. Your team has been contacted about this study.







	<p>There is potential for further alignment on existing and proposed studies and Bristol City Council looks forward to discussing that further through West of England and authority to authority engagement.</p> <p>Through the city's One City Plan, Bristol is guided by the United Nations Sustainable Development Goals and seeks to contribute towards meeting the aims and targets of those global goals. More information on these is available on the Bristol One City Plan web pages. We look forward to discussing our approach with you and considering how our respective plans can be coordinated in a way which assists in implementing these important cross-cutting goals.</p> <p><u>4. Governance</u></p> <p>There are a number of well-established processes and channels for engagement between the West of England authorities, the relationships with the West of England Combined Authority and direct authority contacts at political and officer level. Bristol City Council will be pleased to engage via these processes in the development of planning policies for our areas. Additional or revised processes may be established at the regional or authority to authority levels depending on the particular strategic matters which are being addressed.</p> <p>Bristol City Council will, of course, engage with all public consultation stages in the preparation of the North Somerset Local Plan and will be pleased to continue informal dialogue throughout.</p>
Bath and North East Somerset Council	<p>B&amp;NES welcomes the opportunity to work with North Somerset Council to identify and address the strategic and cross-boundary issues to be addressed through our respective Plans. Please see below the B&amp;NES response to the 4 questions that you asked</p> <p><u>1. Timetable:</u></p> <p>The B&amp;NES <a href="#">Local Development Scheme</a> sets out the Development Plan Documents that we are preparing, their preparation arrangements and timetables.</p> <p>As you know B&amp;NES is also working with WECA and the WECA Unitary Authorities to prepare a Mayoral Spatial Development Strategy (SDS) (not a Development Plan Document but part of the Development Plan). The separate WECA response to you sets out the timetable for the SDS and related work.</p> <p>As noted in the recent Memorandum of Understanding signed by all West of England authorities, in respect of the SDS and NSC Local Plan, it is important that plan preparation timescales are sufficiently aligned so that respective plan-making processes can take account of each other. This is</p>



especially important to ensure that the Duty to Co-operate is to be properly discharged.

## 2. Strategic matters:

B&NES agrees that the issues listed in the table in your letter are strategic matters with cross-boundary implications. The detail of these issues will be considered in more detail through our respective plan making processes, both the WECA SDS and the B&NES Local Plan. In addition, the following are also strategic matters with cross-boundary implications;

- Infrastructure should include energy and water resources, as the distribution of these assets is uneven across the West of England and the networks that support them are cross-boundary in nature.
- Employment related issues should also consider the management of existing strategic employment areas. This would include waste management locations and key retail centres which may have cross-boundary impacts in the future.
- Joint working on climate change as a strategic issue will be necessary to achieve our joint ambition of carbon neutrality by 2030.
- Air quality is within the scope of strategic matters, particularly in relation to strategic and cross-boundary transport infrastructure.
- The approach to the Bristol-Bath Green Belt in plan-making is a cross boundary issue, especially in the context of work on spatial strategies to accommodate new homes and jobs etc.

## 3. Evidence:

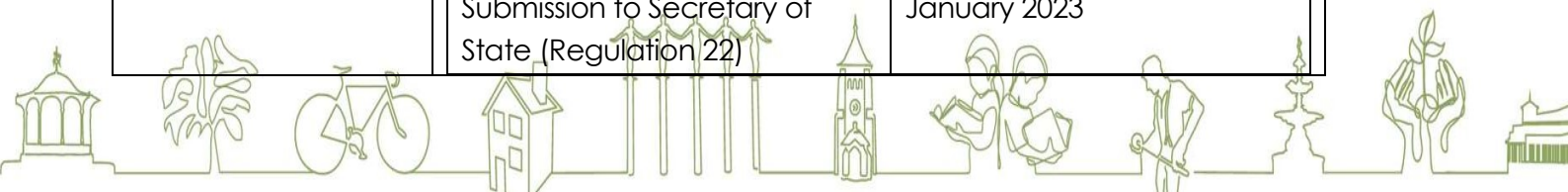
The strategic issues identified above will require a co-ordinated approach between all West of England Authorities to the collation and use of evidence. This reflects the existence of shared Housing Market Areas and Functional Economic Market Areas. Key evidence to support strategic plan making was considered by the West of England Joint Committee in January 2020 when it was agreed to jointly commission strategic evidence to inform plan-making across the West of England. It is important that the evidence supporting the SDS and the North Somerset Local Plan are consistent in light of the relationship of the 2 plans.

## 4. Governance:

The West of England authorities (including North Somerset and WECA) have established processes and governance for joint working on strategic planning, housing and transport issues, which are well placed to manage joint working (including the formal Duty to Cooperate process) for the North Somerset Local Plan as well as the WECA area SDS and the Local Plans for its constituent authorities.



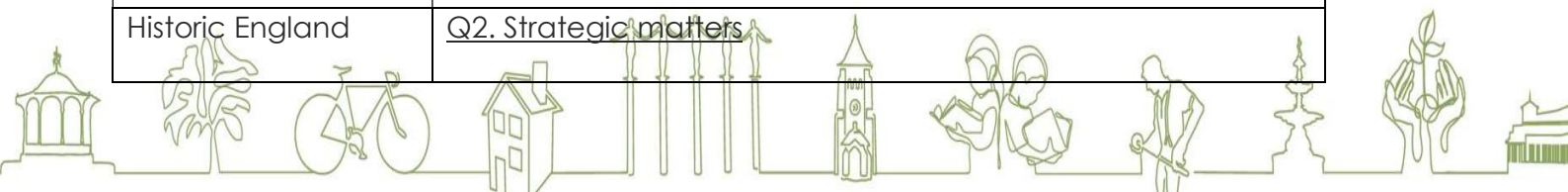
	<p>Furthermore, WECA and North Somerset engage through a well-established series of weekly, monthly and quarterly meetings at which strategic planning (and transport planning) are discussed and decisions taken. It is recommended that discussions continue through these forums, with decisions made at the appropriate level based on technical recommendations. It is noted that many of these decisions will also be documented through the WECA area Duty to Cooperate and Statement of Common Ground, which is currently in development with involvement from North Somerset Council. As such we would expect South Gloucestershire to be formally invited to partake in relevant Duty to Co-operate discussions affecting the WECA area going forward.</p> <p>Bi-lateral officer and or Member meetings between North Somerset and B&amp;NES can be arranged as required as part of the plan-making process.</p> <p>B&amp;NES looks forward to our continued work together on strategic plan-making. Should any of these need further discussion or clarification, I would welcome doing so through the appropriate joint meetings referenced.</p>										
Sedgemoor District Council	<p>Sedgemoor District is an adjoining local authority and therefore will be an important Duty to Co-operate consultee. The two Councils have cooperated closely together on both the Sedgemoor Local Plan (2019) as well as other cross-boundary strategic issues and we look forward to engaging positively with the plan-making process.</p> <p>In terms of the specific questions you have asked, please see our response below;</p> <p><u>1. Development Plan Timetable:</u> We will shortly commence a review of the adopted Local Plan focusing on early evidence base work from October. Our LDS envisages the following timetable:</p> <table border="1"> <thead> <tr> <th>Activity</th><th>Timetable</th></tr> </thead> <tbody> <tr> <td>Early Evidence Base Work</td><td>October 2020 – October 2021</td></tr> <tr> <td>Engagement in Plan Preparation – Issues and Options Consultation(s) (Regulation 18)</td><td>November 2021 – May 2022</td></tr> <tr> <td>Publication and consultation on submission DPD (Regulation 19)</td><td>August 2022 – October 2022</td></tr> <tr> <td>Submission to Secretary of State (Regulation 22)</td><td>January 2023</td></tr> </tbody> </table>	Activity	Timetable	Early Evidence Base Work	October 2020 – October 2021	Engagement in Plan Preparation – Issues and Options Consultation(s) (Regulation 18)	November 2021 – May 2022	Publication and consultation on submission DPD (Regulation 19)	August 2022 – October 2022	Submission to Secretary of State (Regulation 22)	January 2023
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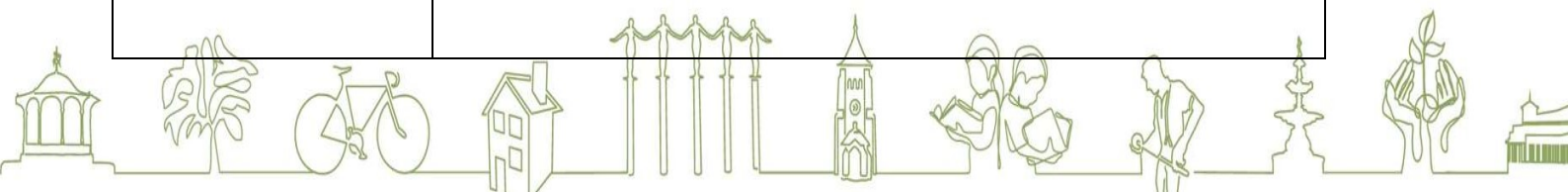


	Examination Hearings	April 2023 – June 2023
	Modifications	July 2023 – August 2023
	Examiners Report	October 2023
	Adoption	December 2023
	<p>In addition to the local plan review we are currently undertaking an update of our Gypsy &amp; Travellers Accommodation Assessment (GTAA). This will potentially lead to an allocation development plan document. However, due to Covid-19 the GTAA has been delayed and it is unlikely therefore that Issues and Options consultation will commence until early 2021.</p> <p><u>2. Strategic Matters</u></p> <p>I believe that the strategic policy areas identified cover all relevant areas. For Sedgemoor key issues will be levels of housing growth and whether this can all be accommodated within North Somerset, strategic locations for growth, transport impacts and flood risk. In addition there may potentially be cross boundary impacts relating to green infrastructure. Through our own local plan the Councils have liaised closely on housing issues in particular and we will be pleased to continue this dialogue.</p> <p><u>3. Evidence</u></p> <p>We are currently developing a new transport model for the district that should be completed by March 2021, subject to resolving the challenges of data collection due to Covid-19. This model would potentially enable impacts of any strategic development located close to Sedgemoor to be assessed.</p> <p>We will also need to update our Strategic Flood Risk Assessment (SFRA) that will require the more detailed Level 2 assessment for the area to the north of Burnham-on-Sea. As yet this has not been commissioned. There may be scope for some alignment or certainly data sharing, working collectively in partnership with the Environment Agency.</p> <p><u>4. Governance</u></p> <p>Initially at an officer level. We are able to report and discuss issues with our Local Plan Working Group that comprises a cross party member group. We would need to keep this under review depending upon the nature of any issues. If for example there was a need to consider accommodating any housing need within neighbouring districts including Sedgemoor, it is likely that discussions would need to involve Leader and Chief Executive with decisions being a matter for Council.</p>	
Mendip District Council	<p><u>1. Development plan timetable</u></p> <p>Mendip is commencing work on a comprehensive review to its adopted local plan part 1. An updated LDS is due to be endorsed at Cabinet on 6<sup>th</sup> July. The part 1 will set out</p>	

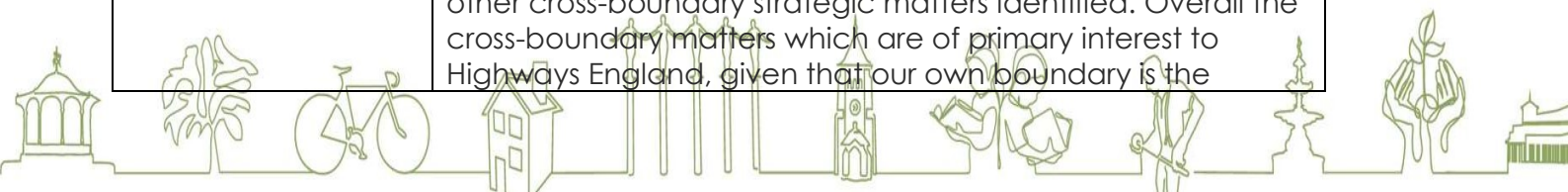
	<p>strategic policies, update DM policies and site allocations. There will also be work on a separate gypsy and traveller DPD. The time period is similar to the N Somerset plan (i.e., 2020-2040)</p> <p><u>2. Strategic Matters</u></p> <p>The key matters to Mendip are likely to be</p> <ul style="list-style-type: none"> <li>• Quantum of housing/ un-met need Gypsies and Travellers</li> <li>• Cross-boundary issues relating to ecology/ landscape/ habitat considerations, water quality and cumulative flood risk (medium and long-term)</li> <li>• Airport development Energy capacity and infrastructure employment flows</li> <li>• Transport infrastructure</li> </ul> <p><u>3. Evidence</u></p> <p>Mendip will be updating its evidence on housing and employment supply/need and environmental studies. While there is likely to be the usual stakeholder consultation no specific studies have been identified where there is likely to be a strong functional overlap/ need for alignment with North Somerset. It would be useful to engage on any studies which have implications for traffic impacts on cross-boundary routes into Mendip.</p> <p><u>4. Governance</u></p> <p>Via the current officer level arrangements via the planning policy team and jointly at SSPC with collective Somerset authorities.</p>
Somerset County Council	-
<b>Prescribed bodies</b>	
Environment Agency	<p>I can confirm that the Environment Agency looks forward to future involvement in the Local Development Framework process.</p> <p>We responded to the Pre-commencement Document, which was received on 10 March 2020 and we concurred with the proposed content, scope and methodology of this plan. This plan should cover the strategic issues which will need to be addressed through the Local Plan process.</p> <p>We have also been involved with NSC and the emerging SFRA which should influence future allocations with respect to flood risk, and we look forward to continued working with you on this.</p>
Historic England	<u>Q2. Strategic matters</u>



	<p>Our historic landscapes and sizeable heritage assets such as prominent landmarks and designated parks and gardens may often span large areas and cross more than a single local authority jurisdiction. Growth and associated infrastructure may have an effect on their significance and therefore the historic environment can be treated as a potential strategic matter.</p> <p>As such it will be important for you to identify these special landscapes and places within and beyond the District as an early stage to ensure direct effects of development or indirect secondary impacts from associated infrastructure, such as new roads, can be appreciated and positively addressed.</p> <p><u>Q3. Evidence</u></p> <p>This relates to Q2 and the gathering of evidence regarding our heritage at the landscape scale. This may be separate or form a distinct 'layer' to any Green Infrastructure work.</p> <p><u>Q4 Governance: How would your authority or organisation wish to engage with duty to co-operate issues and at what level?</u></p> <p>If there is a clear commitment to both appreciating the significance of the historic environment, and responding positively to it, then I'm happy for one to one dialogue especially if cross boundary historic environment evidence is gathered by a consortium of local authority heritage and landscape officers to inform strategic growth and infrastructure decisions as required by national policy. Historic England, and other heritage sector partners, for example the National Trust might oversee and contribute to such sub regional work.</p>
Natural England	<p><u>2. Strategic Matters</u></p> <p>The matters identified above appear reasonable. We can confirm that alongside green infrastructure, the natural environment presents a number of issues and opportunities that are strategic matters and have cross-boundary implications. These matters include the approach taken to designated sites and factoring in the direction of travel on nature recovery and biodiversity net gain that features in the Environment Bill. Coastal squeeze could usefully be added to the list.</p>



	<p><u>3. Evidence</u></p> <p>NE is working with NSC to develop evidence to underpin a strategic approach to protected sites for bats and is keen to work jointly on addressing other issues such as recreational pressure on sensitive sites. NE is also developing evidence, guidance and tools to support implementation biodiversity net gain, and mapping and implementation the nature recovery network. We have also worked with NSC and other WoE authorities to develop evidence and GI standards through the JGIS and can work with you to translate that into your district GI strategy. IN addition we are have launched district licensing for great crested newts with NSC and will be exploring other options with you for better regulatory processes and outcomes. We would expect this information will help to increase the evidence and tools for tackling a range of economic, social and environmental issues.</p> <p><u>4. Governance</u></p> <p>NE would welcome early engagement in all stages of plan preparation, recognising the opportunity the local plan process presents for establishing strategic solutions and approaches to ensure development is sustainable and contributes the Govt's 25 YEP. We have already worked with NSC on the detail of SA scoping for the new local plan.</p>
Highways England	<p><u>1. Development Plan Timetable</u></p> <p>Whilst we recognise that this question is aimed principally at local planning authorities, we would draw attention to the Department for Transport's (DfT) Road Investment Strategy (RIS) which sets out the five year strategy for investment in and management of the SRN. RIS2 covering 2020-2025 has recently been published and the planning for RIS3 (2025-2030), which will be formally announced in 2025, is currently commencing and will be running throughout the North Somerset Local Plan preparation timetable. We would aim to ensure that the Local Plan is prepared with consideration given to RIS2 and any emerging issues in the RIS3 preparation process.</p> <p><u>2. Strategic Matters</u></p> <p>We are pleased to see Infrastructure included in the list of strategic matters with cross-boundary implications, with the issue of transport covered under this. We would also highlight that transportrelated issues are relevant to a number of the other cross-boundary strategic matters identified. Overall the cross-boundary matters which are of primary interest to Highways England, given that our own boundary is the</p>





transition from the local road network to the SRN, are those which have the potential to result in additional pressure on the SRN.

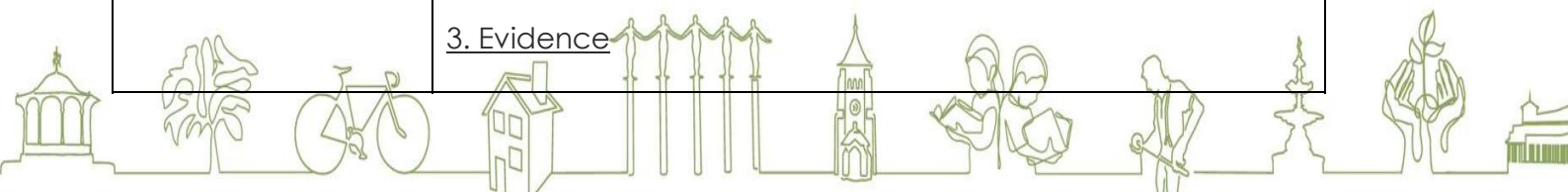
Housing – the quantum and location of new housing can have significant implications for the safe and efficient operation of the SRN. We would wish to see the Local Plan deliver new housing located in sustainable locations (i.e. close to employment opportunities and main service areas, and well located to be served by public transport, walk and cycle routes) in order to minimise increased demand on the SRN.

Employment – travel to work is a key issue in North Somerset, with the city of Bristol and the surrounding area providing a large amount of employment opportunities. Due to Bristol employment being spread over a large area, there are challenges with providing an attractive alternative means of travel to the car, which again can result in increased pressure on the SRN. We would wish to see the Local Plan look to consolidate growth where there are reasonable alternatives available, for example making best use of transport infrastructure assets already established.

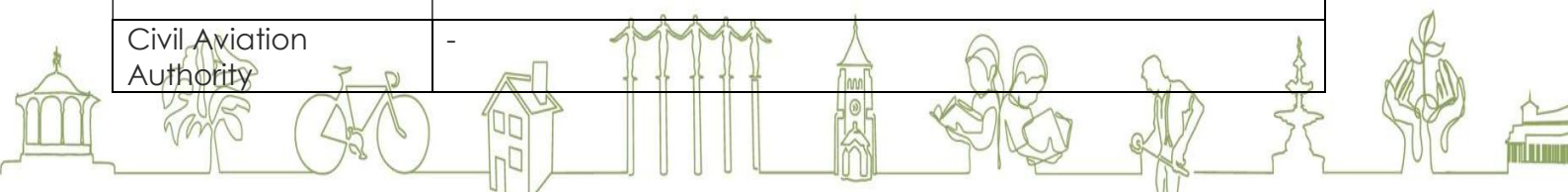
Infrastructure – we would highlight that the transport assessment for the new Local Plan should recognise that parts of the SRN (i.e. M5 J19 and J21) experience weekday capacity issues spread over a peak period rather than just a peak hour. Also, the section of the M5 through North Somerset has a significant seasonal variation in traffic flow which needs to be considered alongside the daily variation. In relation to these issues, a new junction on the M5 south of J21 was considered during the preparation of the West of England Joint Spatial Plan (JSP).

Overall we would highlight that there are challenges associated with any mitigation schemes which may be required on the SRN as a result of additional pressure, for example the high cost of schemes due to the limited capacity for expansion of the existing network. Hence we are keen to work with the Council in order to ensure that any additional pressure on the SRN resulting from the new Local Plan is minimised.

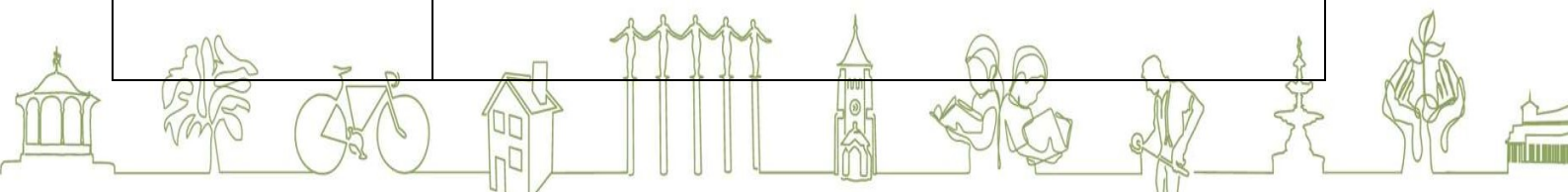
### 3. Evidence



	<p>We would wish to work closely with the Council to ensure the transport evidence base and transport assessment for the new Local Plan (i.e. trip rates, trip distribution, peak period/hour impacts etc.) is mutually agreed.</p> <p>Highways England is aware that North Somerset Council has commissioned a transport model for North Somerset and the surrounding area. Although we are not part of the model development team, we have been engaged in the model development process and its calibration and validation. We accept that the new North Somerset transport model is a good foundation for the Local Plan assessment. We would welcome the opportunity to refresh our understanding of the model and agree any outstanding issues. For example, for the purposes of the new Local Plan it is crucial that an acceptable peak hour assessment is derived from the peak period model and we would wish to be engaged in regard to how the impact of the development allocations will be assessed and identified.</p> <p>Highways England hold a detailed model (VISSIM) of M5 J19 which can be shared with the Council to assist in the new Local Plan preparation. We are also currently looking at developing a detailed model of M5 J21 and will keep the Council updated as this work progresses.</p> <p>Depending on the location of the development allocation in the new Local Plan, consideration will need to be given as to whether a model of M5 J20 and the surrounding area is required.</p> <p><u>Q4 Governance: How would your authority or organisation wish to engage with duty to co-operate issues and at what level?</u></p> <p>Reflecting the issues highlighted above, Highways England envisages two related strands to our engagement with the Council on the new Local Plan. One strand would be at the policy level to agree the SoCG and feedback our issues regarding the impacts and any proposed mitigation relating to the SRN as per questions 1 and 2 above. The other strand would relate to the more technical level relating to the transport evidence base, modelling and assessment as per question 3 above.</p>
Civil Aviation Authority	-



Homes England	-
Office of Rail Regulator	-
NHS Clinical Commissioning Groups	-
Marine Management Organisation	-
West of England Local Enterprise Partnership	<p>As you are aware, the West of England LEP covers the four unitary authority areas of Bath &amp; North East Somerset, Bristol, North Somerset and South Gloucestershire. The LEP welcomes North Somerset bringing forward work on their Local Plan, and joint working to address strategic issues and support economic growth in the region.</p> <p>The strategic vision of the West of England LEP is contained in the West of England Local Industrial Strategy (LIS). The LEP would therefore refer North Somerset Council to this document (and any subsequent updates), and ask the Council to have regard to its implementation in the development of the North Somerset Local Plan.</p> <p>The LEP recognise that the Duty to Cooperate is an ongoing part of the plan making process. Whilst the LEP reserves the right to issue formal responses in future, in the absence of a specific response to future consultations or subsequent correspondence from the LEP, this letter can be taken as the LEP's response.</p>
Heart of the South West Local Enterprise Partnership	<p><u>Q1. Development Plan Timetable</u></p> <p>Not applicable as Heart of the South West LEP is not a local planning authority</p> <p><u>Q2. Strategic Matters</u></p> <p>The Heart of the South West LEP agrees with the strategic cross-boundary matters identified. Other potential matters could be around energy infrastructure</p>

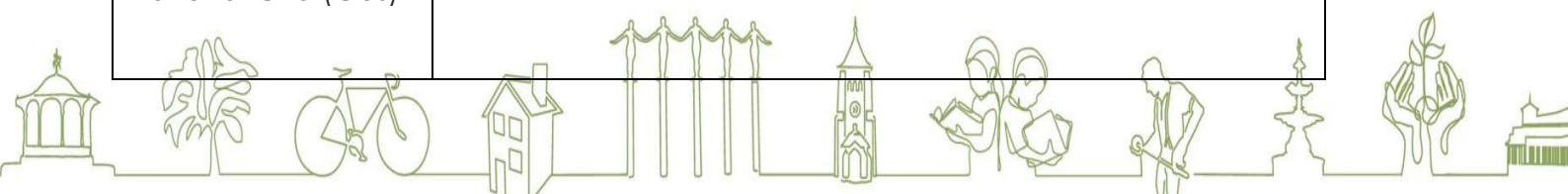


	<p><u>Q3. Evidence</u></p> <p>An employment land study was conducted in 2019 for all districts in the Heart of the South West, including those adjoining North Somerset.</p> <p><u>Q4. Governance</u></p> <p>Engagement would need to be at a strategic level. The Heart of the South West LEP does not have a formal procedure for this. Any specific issues could be raised for discussion at the Place Group meeting however this would only be around issues that may directly affect the Heart of the South West area, eg highways, transport, infrastructure.</p>
<p>West of England Nature Partnership</p>	<p><u>Q2. Strategic Matters</u></p> <p>We are pleased to see the recognition of ecological, landscape and habitat considerations as cross-boundary issues, which are of most relevance to WENP. A <a href="#">Nature Recovery Network for the West of England</a> has been developed through WENP, showing the West of England's key habitats and how they are functionally connected. This will be a key resource in considering the cross-boundary implications for ecology and habitat.</p> <p><u>Q3. Evidence</u></p> <p>As mentioned in Q2, the <a href="#">Nature Recovery Network for the West of England</a> is a key resource for considering the impact of proposed developments on ecological connectivity and opportunities for improving the connectivity and resilience of ecological networks.</p> <p>In addition, in 2016 WENP developed a suite of ecosystem service maps (<a href="https://www.wenp.org.uk/state-of-environment/">https://www.wenp.org.uk/state-of-environment/</a>) that show the best opportunities for habitat creation (which were used to help build the Nature Recovery Network), and areas that provide the highest levels and best opportunities for natural flood management and improvements in water quality.</p> <p>There is potentially an opportunity to expand and update this suite of ecosystem service maps to include other ecosystem services, such as carbon sequestration.</p> <p>WENP has also mapped <a href="#">access to green space in the West of England</a>, using walking routes rather than 'as the crow flies' measurements. Access to green space is important for people's health and wellbeing, as the Covid-19 crisis is</p>





	<p>serving to reiterate, and this mapping could be used to help identify areas that are in need of provision of green space.</p> <p>These pieces of evidence form part of the mapped datasets used to inform the West of England Joint Green Infrastructure Strategy (listed in Appendix 1 of the JGIS), which should be available to North Somerset).</p> <p>The Forest of Avon Trust is being commissioned through WENP to produce a Tree and Woodland Strategy for the West of England, which is planned to be completed by the end of the year and should form part of the evidence base for the Local Plan.</p> <p><u>Q4. Governance</u></p> <p>As WENP is a partnership consisting of organisations across the West of England with an interest in the natural environment, which includes North Somerset Council, we would expect to discuss the strategic issue of green infrastructure through the partnership. This would provide a forum for a collaborative discussion between partners in the West of England on green infrastructure in the context of the local plan, with the results of any discussions able to be fed through the North Somerset Council representative on the Board.</p> <p>However, we would also welcome the possibility of forming part of any dedicated forums relating to the strategic discussions outlined above, and especially for green infrastructure. This would need to be cognisant of the fact that North Somerset Council is represented on the WENP Board.</p> <p>Please also note that organisations that form part of WENP will have their own mechanisms for engaging with the duty to cooperate issues.</p>
<b>Additional bodies</b>	
Network Rail	Network Rail should be consulted on any Local Plans that may impact on railway infrastructure or include the railway within the site boundary plan.
National Grid (Gas)	-



National Grid –  
Electric

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

Avison Young responded on behalf of National Grid to North Somerset Council's Local Plan Pre-Commencement Document Consultation on 20 April 2020 and sought to outline National Grid's assets and rights under the Hinkley Point C Connection Development Consent Order. For completeness, these comments are included in the letter below.

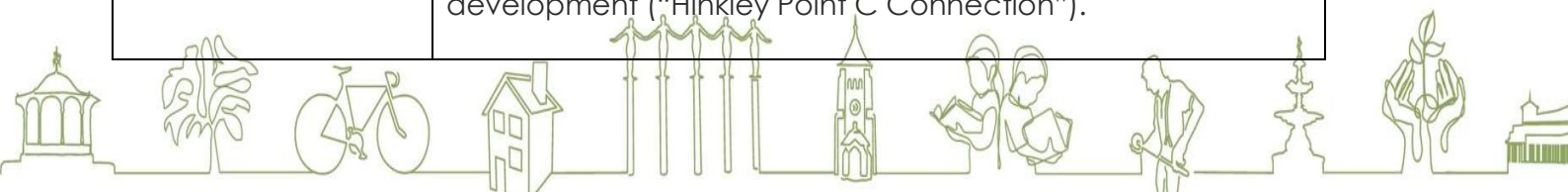
About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

National Grid assets within the Plan area: Following a review of the above Development Plan Document, we provide details of the National Grid assets below.

Hinkley Point C Connection Development Consent Order Area In May 2014 National Grid applied for a Development Consent Order ("DCO") under the Planning Act 2008 ("PA 2008") to authorise a proposed 400,000 volt (400kV) connection between Bridgwater, Somerset and Seabank substation, north of Avonmouth together with associated development ("Hinkley Point C Connection").



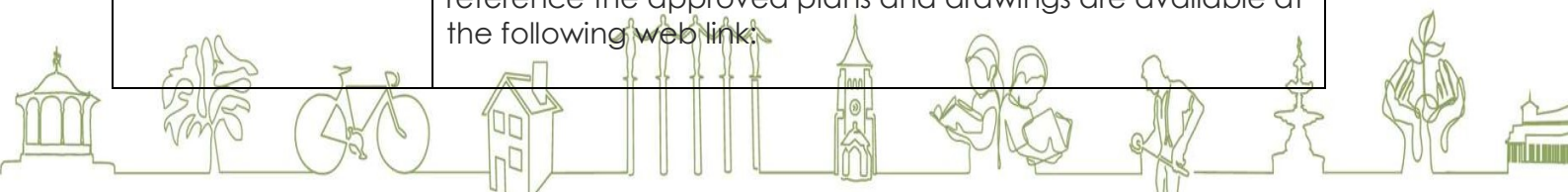
The Hinkley Point C Connection Project is a Nationally Significant Infrastructure Project under section 14(1)(b) and s16 of the PA 2008. Its purpose is to reinforce the transmission network in the region and facilitate the connection of the proposed Hinkley Point C new nuclear power station and other proposals for low carbon generation. In January 2016, the then Secretary of State for Energy and Climate Change granted consent to National Grid's DCO application and on 19 January made the National Grid (Hinkley Point C Connection Project) Order 2016 ("the Order"). The Order, which authorises National Grid to construct, operate and maintain the Hinkley Point C Connection and to acquire interests in land compulsorily for that purpose, came into force on 9 February 2016. This Order was subsequently amended by the Secretary of State as the National Grid (Hinkley Point C Connection Project) (Correction) Order 2017 on 19 October 2017.

Under the Order, National Grid is granted both permanent and temporary compulsory acquisition powers to construct, operate and maintain the Hinkley Point C Connection. The order sets out six classes under which land or rights may be acquired permanently or land possessed temporarily. In respect of part of the Application Land, National Grid has the following rights:

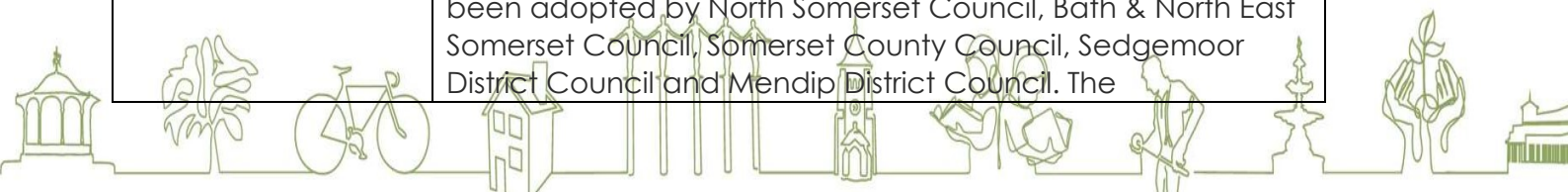
- Class 2 (Compulsory Acquisition of Rights for the Authorised Development), which also includes Classes 3 (access), 4 (construction and mitigation), 5 (dismantling of redundant infrastructure) and 6 (temporary access);
- Class 4 (construction and mitigation); and
- Class 5 (dismantling of redundant infrastructure).

It is therefore imperative that any future development proposals progressed through the Local Plan do not compromise or delay National Grid's ability to deliver the Hinkley Point C Connection in accordance with its statutory and contractual duties. National Grid will continue to monitor the progress of the Local Plan and where relevant, comment on and engage with the Council and applicants on specific proposals.

Given the scale of the project we have, at this stage, provided an overview plan of the project as it relates to the North Somerset Council area - see attached plan. We would be pleased to provide further information if that would assist the Council in the preparation of the Local Plan. For reference the approved plans and drawings are available at the following [web link](#):



	<p><a href="https://hinkleyconnection.co.uk/plans-and-drawings/">https://hinkleyconnection.co.uk/plans-and-drawings/</a></p> <p>Please also see attached information outlining further guidance on development close to National Grid assets.</p> <p>Further Advice National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.</p>
Water	-
Drainage Boards	-
Wessex Water – Sewerage	Wessex Water will be pleased to cooperate as appropriate on strategic policy issues related to our services. An initial meeting will be useful to scope data and information required from Wessex Water.
Telecommunications	-
Coal Authority	I have reviewed the questions asked in respect of the Duty to Co-operate for the Local Plan and can confirm that the Coal Authority has no specific comments to make.
Mendip Hills AONB Unit	<p><u>Q 1. Development Plan Timetable</u></p> <p>The Mendip Hills AONB Partnership produced the Mendip Hills AONB <b>Management Plan 2019-2024</b> as required by the CRow Act on behalf of the joint local authorities and the Plan has been adopted by North Somerset Council, Bath &amp; North East Somerset Council, Somerset County Council, Sedgemoor District Council and Mendip District Council. The</p>





Management Plan under paragraph 1.4 sets out a Statement of Significance on the special qualities of the Mendip Hills AONB that create the Mendip Hills sense of place and identity and these include views from the Mendip Hills AONB, settlements of Mendip stone largely confined to the spring line, retaining dark skies and a sense of tranquillity.

The Management Plan is due to be review in 2024.

In addition, **Monitoring Environmental Outcomes in Protected Landscapes data** (MEOPL data) is collected annually by Natural England and applied to AONB boundaries. This data helps to inform the Management Plan.

The Mendip Hills AONB Unit produce **Nature Recovery Plans** that are 'live' documents, which formally help to inform the Management Plan. NRPs contribute to local authority Local Nature Recovery Strategies. Nature Recovery Plans may in future be used as part of the decision making process for the use Biodiversity Net Gain plans and levies.

## Q2. Strategic Matters

Mendip Hills AONB Partnership agrees that the listed strategic matters with cross-boundary implications are of relevance to North Somerset.

In addition, it should be noted that the nationally protected landscape of the Mendip Hills Area of Outstanding Natural Beauty (AONB) covers 198 square kilometres from Bleadon in the west to Chewton Mendip in the east. The AONB partly lies within the North Somerset to the south-west of the wider Bristol area and south-east of Weston-Super-Mare. Areas of Outstanding Natural Beauty are some of the UK's most cherished and outstanding landscapes.

The Countryside and Rights of Way (CRoW) Act 2000 confirmed the significance of the AONBs and Section 85 places a statutory duty on all relevant authorities to have regard to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within as an Area of Outstanding Natural Beauty. Potential development proposals outside of the boundaries of AONBs that may have an impact within the designated area, are also covered by the 'duty of regard'.

The National Planning Policy Framework (NPPF) under paragraph 172 sets out that 'great weight should be given to



	<p>conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.</p> <p>As set out in Natural England's National Character Area (NCA) profile for the Mendip Hills (141), the area is 'renowned for its tranquillity and inspirational qualities...' The NCA further recognises that 'Light pollution from development threatens the extent of the recognised dark skies and out-of-character development is a continuing risk to the essential nature of the area.' Within the NCA Statement of Environmental Opportunity under SEO1 it sets out 'Safeguard inward and outward views and to the distinctive hill line and conserve and enhance the special qualities, tranquillity, sense of remoteness and naturalness of the area'.</p>
South West Local Aggregates Working Party	<p>Members of the Aggregates Working Party (AWP) have noted the content of the letter and welcome the involvement of the AWP in development of your Local Plan. The AWP members also consider that the supply of aggregate minerals is a strategic issue requiring a policy relationship between the AWP and North Somerset Council. The AWP would wish to be kept up to date with the Local Plan as it progresses.</p>

