



PAS
Statement of Common Ground
Advice and Template

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v1.0

PAS Statement of Common Ground Advice and Template

Under the 2018 National Planning Policy Framework (2018 NPPF) strategic policy making authorities, such as local planning authorities, should produce, maintain and keep up to date a Statement of Common Ground (SCG) to highlight agreement on cross boundary strategic issues with neighbouring authorities and other relevant bodies.

The Planning Advisory Service (PAS) has produced this advice note and template to help local authorities to produce an SCG; based on what planning practice guidance expects an SCG to contain and from our experience working with groups of local authorities. It should be read alongside the relevant [NPPF](#) paragraph (Para 27) and Planning Practice Guidance ([Chapter on Maintaining Effective Cooperation](#)).

The Statement of Common Ground

A Statement of Common Ground (SCG) should be produced, published and kept up to date by the signatory authorities as an accessible and public record of where agreements have or have not been reached on cross boundary strategic issues. The purpose of the SCG is to document the cross-boundary matters being addressed and progress in cooperating to address them. It is the means by which authorities can demonstrate that their plans are based on effective and ongoing cooperation and that they have sought to produce strategies that as far as possible are based on agreements with other authorities.

The SCG should increase certainty and transparency, at an early stage in the plan-making process about where effective cooperation is and is not happening. It should highlight the cross boundary strategic planning matters in authorities' plans and outline the timetable for gaining agreement on different strategic matters, and providing commitment through relevant organisations giving signed agreement on the required issues.

The SCG is expected to be concise and expected to contain:

- A list of the planning authorities and any additional organisations that are signatories to the SCG.
- A list of individual signatories; names and roles of planning authority's political leaders and the relevant representatives of other strategic organisations.
- A list of the key strategic matters being covered,
- A short description and map showing the geography that the SCG covers and brief justification of the area.
- A description of the governance arrangements for cooperation and how the SCG will be kept up-to-date.
- A list of the housing requirements in any adopted and emerging plans, if applicable to the key strategic matters.
- An agreement of how housing need will be distributed across the area, including unmet need, or the process for agreeing the distribution across the area.

- A list of agreements that have or have not been reached on the key strategic matters and the activities undertaken to reach agreement. If no agreement has been reached, the proposed process and date for reaching agreement, or how this has affected the relevant strategic issues and the content of the plan.
- Any additional strategic matters that are deemed as required in the SCG, such as a brief description how the SCG relates to any other SCG covering all or part of the same area.

The SCG is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites.

It is expected that in the majority of case an authority will only produce one SCG but it is in their discretion to produce more if it is felt that it would be the clearest way of expressing agreements on different strategic issues with different partners.

Local Authorities should have published their SCG on their website at the latest by the time they publish their draft plan (Regulation 19 stage) and it should support the LPAs Duty to Cooperate requirements. It should be an aid for an Inspector when examining an authority's plan; highlighting the required agreements on cross boundary strategic issues and sit together with an authority's Duty to Cooperate statement to show how the agreements have influenced the plan.

When agreed, a SCG could be used as evidence of effective co-operation between authorities to secure grants for infrastructure and delivery funding.

We hope that this note and template will help local authorities to prepare their SCGs. It should be adapted to individual needs and used as a prompt to ensure that the relevant information is included.

Statement of Common Ground

Advice Note

The note is structured against the headings of the template.

1. **Parties involved:** LPAs and other strategic bodies engaged in the SCG.
 2. **Signatories:** which might be related to specific issues and highlight where agreements have not been reached.
 3. **Strategic geography:** in a map with description and justification.
 4. **Strategic matters:** including housing requirement and distribution, key infrastructure requirements, relationships to other strategic issues.
 5. **Governance arrangements:** how the SCG has been agreed or will be agreed and kept up-to-date.
 6. **Time table for agreement, review and update:** as known or proposed related to LPAs plan timetables.
- **Other issues:** Waste & minerals Plans, Relationship between SCGs & facilitators.

1. Parties involved:

Local authorities and other strategic bodies that relate to the issues included in a document need to have been engaged in and agreed the SCG.

Strategic bodies other than the local authorities could be Local Enterprise Partnerships, Local Nature Partnerships, Marine Management Organisation, county councils, combined authorities, infrastructure providers, advisory bodies, plus others that have a role in the issues being planned for. The additional signatories will only need to agree with those parts of the SCG that are directly relevant to role and required cooperation.

2. Signatories:

The SCG needs to be signed by an agreed individual in a leadership position from each of the local authorities and strategic bodies. For the local planning authorities this will be a Councillor such as a leader or portfolio holder of the Council. The signatories give the public commitment that agreement has been or will sought to be reached.

Depending on the situation it might be that the signatories will need to be presented in a way to highlight where an agreement has not been reached by all parties, or where some signatories, planning authorities or other strategic bodies, might only be signatories related to specific issues.

It is really worth thinking early on about how a SCG will be agreed and what sign off requirements individual authorities will require, whether this can be through delegated authority or whether the SCG has to be agreed by a Cabinet or Full Council.

3. Strategic geography:

The SCG should include a map to show the geographical area covered by the document, showing the administrative boundaries, any key relationship with adjacent LPA areas and overlaying initiatives such as Growth Corridors. It should also include a brief description of the area and justification for the agreed area. The justification for the area will relate to the most appropriate functional geographical area to gather evidence and develop policies to address the strategic matters being planned for.

Authorities may well work in different groupings to address different strategic matters. They should be pragmatic in determining the areas which may be different for different issues.

4. Strategic matters:

Identifying the cross boundary strategic issues can prove to be quite complex, with the number and type of strategic cross-boundary issues potentially being extensive and very diverse. If the scope of the SCG is too broad the ability to produce a document that is clear and concise will be reduced. It is useful to set out agreed spatial priorities. This doesn't need to be lengthy but should demonstrate a collective shared view of long term priorities. In addition to setting out cross boundary issues, this could highlight initial unresolved issues and set out a clear strategy for when and how discussions to resolve them will take place.

If considered a relevant cross-boundary, strategic matter, a SCG is expected to set out the housing requirement in any adopted and emerging plan relevant to the area covered by the SCG and its distribution across the highlighted area. This should include information on individual authorities housing need based as a minimum on the Government's standardised Local Housing Need (LHN) figures and local plan targets (either agreed or emerging), the extent of any unmet need in the area, the ability for unmet need to be taken by other authorities in the area and any agreements or disagreements on how this is redistributed.

The SCG should also highlight key infrastructure requirements such as transport, community facilities, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, minerals and energy necessary to support housing, employment, retail, leisure and other commercial developments as well as cross boundary relationships to other strategic issues such as conservation and enhancement of the natural, built and historic environment and climate change.

The SCG should highlight evidence of activities undertaken to address cross boundary issues that are being covered. Such evidence could include:

- Producing or commissioning joint research and evidence to address cross-boundary matters.
- Jointly assessing the impacts of emerging policies.
- Preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated,

Such evidence should be referenced and highlighted, where possible, as web links in the appendix of the SCG.

5. Governance arrangements

The governance and management arrangements for a SCG are key to its implementation and effectiveness. The SCG needs to set out how it has been agreed or will be agreed and how it will be kept up-to-date. The arrangements must provide confidence that cooperation will be effective between the local authorities and other bodies. Some local authorities will already have close working relationship between the Councils and good communication between officers and Members, whereas others will need to facilitate and support this process.

It may be advisable to set up a specific management group and leadership group for the SCG. Most authorities will already have relevant officer and Member planning groups that meet which could appropriately take on this role.

The leadership group should be made up of relevant political leaders (Council Leaders or Portfolio Holders) that can make decisions or represent the document both to their Council and to the public. Early engagement of the leadership and governance group is strongly advisable.

The formation of a small group of officers who can co-ordinate the work on the SCG is useful. This is obviously a lot easier where these relationships already exist through active officer policy groups and other working groups. The groups are well placed to work collaboratively to create a robust SCG and demonstrate that they have met the Duty to Co-operate requirements. All parties involved need to be open and collaborative, sharing information and evidencing requirements where necessary, with all parties working towards the same collective goal.

To ensure the effective and timely production of a SCG, it is advisable to gain agreement by consensus for a single authority or individual to take the responsibility for requesting and collating data from all the authorities involved and to take responsibility for drafting and updating the document.

Each authority will need to appoint a main point of contact, who will take responsibility for that authority's inputs and review drafts. They will need to keep Leaders, Chief Executives, etc. aware of what they are hoping to achieve – and advise them of any significant emerging issues.

6. Time table for agreement, review and update

A timetable/programme for the development of the SCG should be included. This makes it clear that the SCG is a live document which is expected to be reviewed and updated on an ongoing basis.

An initial SCG should ideally be published as soon as the geographic area, the governance arrangements and key strategic issues have been agreed. Authorities can publish a SCG highlighting where issues still need to be agreed, including how and when they are expected to be agreed and the document updated.

The timetable/programme should include triggers for reviews of the SCG as well as known milestones. It needs to be updated at key stages in the plan making process relating to each individual authority's plan, when new evidence becomes available or decisions are made..

A table format may be helpful to express individual plan progress clearly and make updating easier (See section 6 Appendix 1). As new information on housing need and distribution becomes available it needs to be timetabled and added.

This is an appropriate place to also highlight and address the potential risks to progress and contingencies.

Local Authorities should ideally publish their SCG on their websites as soon as the area, governance arrangements and key strategic matters have been agreed and at the latest by the time they publish their draft plan to support the LPAs in meeting their Duty to Cooperate requirements. It should be an aid for an Inspector when examining an authority's plan; highlighting the required agreements on cross boundary strategic issues and sit together with an authority's Duty to Cooperate statement to show how the agreements have influenced the plan.

- **Other things:**

Minerals & Waste Plans – Relevant Local Authorities will be required to produce SCG for minerals and waste plans. Districts are additional signatories on SCG for county council's minerals and waste plans, along with aggregate working parties on minerals plans.

Relationships between SCGs – The links between overlapping and neighbouring SCG needs to be clearly explained, for example where wider strategic issues are effected, , such as major infrastructure or large environmental designations, or where Housing Market Areas split authorities. This could be explained through a map/diagrammatic form with relevant cross referencing to ensure consistency and co-ordination.

Arbiter/Facilitator role – Most SCG should be produced by local authorities without the need of an independent facilitator or arbiter to aid them. However, some complex arrangements may need this role. Authorities may use elected Mayors, combined authorities, county councils or consultants to act as an arbiter or facilitator to assist in the preparation of a SCG if required.

Appendix 1 Statement of Common Ground (suggested template)

1. **Parties involved:** LPAs and other strategic bodies engaged in the SCG.
2. **Signatories:** which might be related to specific issues and highlight where agreements have not been reached.
3. **Strategic geography:** in a map with description and justification.
4. **Strategic matters:** including housing requirement and distribution, key infrastructure requirements, relationships to other strategic issues.
5. **Governance arrangements:** how the SCG has been agreed or will be agreed and kept up-to- date.
6. **Time table for agreement, review and update:** as known or proposed related to LPAs plan timetables.

<p>1. List of Parties involved: <i>list of LPAs and other bodies which have engaged in the SCG (details of each organisation can to be listed in an appendix)</i></p>
<p>2. Signatories: <i>Organisation, name, position, signature – cross-reference to specific issues</i></p>
<p>3. Strategic Geography <i>including a map, short description and justification for the strategic planning area that covers the SCG</i></p>
<p>4. Strategic Matters <i>Define the issues, (see NPPF Para 20 for strategic matters) including housing requirement and distribution, including any issues that remain unresolved and how the authority plans to manage these. Outline what the implications are of these unresolved matters.</i> <i>Evidence of activities undertaken to address an issue should be highlighted such as:</i></p> <ul style="list-style-type: none"> • <i>Producing or commissioning joint research and evidence to address cross-boundary matters.</i> • <i>Assessing impacts of emerging policies.</i> • <i>Preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated,</i> <p><i>(Details of references and web links to key evidence can be listed in an appendix)</i></p> <p><i>Example table of housing requirement and distribution</i></p>

LPA	OAN	MHCLG LHN	Local Plan target	Plan status	Year	Plan period
LPA 1	200	250	250	Reg.18 Consultation	2018	2016-2040
LPA 2	250	200	450	Adopted	2016	2012-2030
LPA 3	1,500	1,400	1,800	Reg.19 Consultation	2018	2014-2035
etc						
etc						
Totals	4,500	4,400	5,000			

5. Governance Arrangements

How decisions on the SCG will be managed and agreed

6. Timetable for review and ongoing cooperation

The timetable for gaining agreement and for the SCG to be reviewed, (ie Plan review, update and submission timetables), how strategic issues will be managed on an ongoing basis, the mechanisms being used to do this, how it will be monitored

Example of Plan Review, Update & Submission Dates

LPA	Present Plan Adoption	Proposed Plan Review Date	Target Reg.18 Date	Target Reg.19 Date	Target Submission Date
LPA 1	Dec 2018	Jan 2019	Mar 2019	Sept 2019	Jan 2020
LPA 2	June 2016	Dec 2020	June 2020	Dec 2021	Mar 2021
LPA 3	Dec 2014	Jan 2019	Mar 2019	Sept 2019	Jan 2020
LPA 4	Jan 2003	Jan 2019	April 2019	Oct 2019	Feb 2020
LPA 5	Nov 2018	Not known	Not known	Not known	Not known
etc					