

Matter 1

Matter 1/Issue 1.1/Q1.9 With particular regard to prescribed bodies, where Appendix 1 to document EXA036a identifies consultation only having taken place at various stages of plan-making, is this sufficient to demonstrate that the duty has been met?

1. Appendix 1 of document EXA036a states that at all previous consultation stages 'no comments were received' from the ICB.
2. Table 1 below provides a summary of key engagement to date provided by the ICB.

Date	Correspondence
14 September 2022	BNSSG ICB convened with Bristol City Council (BCC) to discuss the NHS input into the new Local Plan.
15 June 2023	Nick Bryant (BCC) and Dominic Houston (consultant from Three Dragons) attending the ICB's Estates Steering Group meeting to give an update on the process and timelines for the development of the new Local Plan. It was agreed that BCC would engage with the ICB to discuss the requirements for health infrastructure.
16 August 2023	Follow-up meeting took place with Dominic, BNSSG ICB and NHS Property Services. This meeting formed part of the baselining and initial assumption stage of the IDP and focused on the provision of current infrastructure and the implications of the draft housing trajectory.
19 September 2023	BNSSG ICB submitted the draft IDP via email. A follow-up meeting between the BNSSG ICB and Dominic was cancelled by Dominic as he confirmed he was content with the information previously provided by the ICB.
November 2023	Further email from Dominic confirming that Three Dragons had submitted the IDP to BCC several weeks prior and had not received and comments back from them.
25 January 2024	BNSSG ICB's formal Local Plan consultation response was submitted.

1 February 2024	BCC and BNSSG ICB Housing Growth and Health Workshop, hosted by BNSSG ICB
24 May 2024	BNSSG ICB letter to BCC expressing concern that none of the issues raised in the formal Local Plan consultation response had been addressed in the Plan submitted to the SoS and requesting further engagement prior to examination.

Table 1: BNSSG ICB engagement requests - Bristol Local Plan Review

3. As evidenced above, the ICB responded to engagement requests with BCC and external consultants during the preparation of the Local Plan, including both Regulation 18 plan-making stage in 2022 and the preparation of the IDP. The strategic matters raised during ICB engagement are not referenced within the Bristol Local Plan Examination Topic Paper: Maintaining Effective Cooperation. As such, BCC have not sufficiently demonstrated that there is on-going effective joint working.

4. It should be acknowledged that existing primary care capacity challenges relating to the level of housing growth proposed in the Local Plan were first discussed in the meeting between the ICB, NHS Property Services and Dominic (Three Dragons) in August 2023. The ICB also voiced concern over existing correlations between deficits in healthcare provision, higher levels of deprivation and the potential adverse cumulative impact of new resident populations on current primary care facilities. The detailed information provided by the ICB to inform the IDP and emerging Local Plan policies for the development strategy areas has not been reflected by BCC in the submission version of the Local Plan or the IDP.

5. The Bristol Local Plan: Soundness, Legal and Procedural Requirements Note questions whether “the Duty to Cooperate Statement(s) of Common Ground i) identify these issues; ii) identify the bodies you have engaged with or continue to engage with; and iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference”? In response to this, BCC state that “yes, we are confident our plan will meet this requirement” and provides the following reason for score as “as set out in statements of common ground”. BCC has not prepared a SoCG with BNSSG ICB and has not responded to multiples requests for engagement from the ICB to address our concerns about the impact of the proposed level of growth on health infrastructure.

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