

Matter 15

Matter 15/Issue 15.1/Q15.5(c) Is policy HWB2 justified, consistent with national policy and effective? In particular: What measures to mitigate the adverse impact of a development should be secured by planning obligations and how has the need for these been identified?

1. Policy HW2B is justified and compliant with national policy. However, the ICB is concerned that the current policy wording is loose and its effectiveness could be improved to ensure there is an explicit link between new developments and the requirement for adequate health mitigation measures.
2. Policy HW2B fails to provide clarity on healthcare-related developer contributions. There is no further clarity provided in either the IDP or Planning Obligations Supplementary Planning Document (SPD), as healthcare is not sufficiently covered in either document. As such, this creates a level of uncertainty which undermines part iv of Policy HW2B, namely providing good access to health facilities and services in Bristol City Centre.
3. As per our comments on Matter 4, the ICB notes that the Planning Obligations SPD (adopted in 2012) and the Planning a Healthier Bristol: Assessing the Health Impacts of Development Practice Note (adopted in 2013) are out of date and do not reflect the ICB's current standards or requirements.
4. These concerns were originally raised in our Regulation 19 response in January 2024 and were further raised in an email to the Planning Policy Team via email by the ICB's Deputy Chief Executive in May 2024. The ICB emphasises that the above concerns do raise questions over the soundness of the Local Plan Review submission, as, at current, the submitted Local Plan and supporting documentation fail to account for the potential health impacts associated with the projected growth.
5. To address these concerns, it is paramount that city-wide health impacts are assessed within the IDP and that our proposed modifications set out in our earlier Regulation 19 response, particularly to the IDP regarding the approach to determining required healthcare contributions, are incorporated. This will ensure that there is a clear and up-to-date methodology for establishing healthcare developer contributions across Bristol.
6. Please refer to our responses to Matters 1, 4 and 6 for further commentary on these topics.

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