

## **Failure on Duty to Cooperate with Health Services**

**The JSP fails the test of soundness because it fails to provide the right amount of housing in a sustainable way. In addition, the JSP fails in its Duty to Cooperate with NHS England in setting out the additional health service provision required to meet this growth.**

The NPPF (para 156) states that *“Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver ... the provision of health .... ”* and in para 171 states that *“Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population”*

Chapter 1 Para 12 of the JSP states that *“The Plan has been prepared working closely with key stakeholders including .... Public Health”*, and under Policy 5, para 35 states that *“New development and infrastructure provide opportunities to ..... access to healthcare services”*. However, the only mention of any new healthcare facilities to deal with the impact of additional housing is found in Policy 7.2 (Whitchurch), where it explicitly mentions the need for a new healthcare facility.

We see no evidence that any actual review of current and projected (post development) healthcare capacity has been undertaken, and no reassurance that this will get any consideration whatsoever in the rush to expand housing development. From local knowledge we are aware that GP capacity, in particular, is a significant problem in Thornbury (Patients per full time GP at 2,090 at the last point of measurement in January 2017 vs “capacity” defined as 1,700), and this will grow as less than half of the current crop of developments has been built out. It is our view that the JSP is paying lip service to the need to work with healthcare providers, and that no actual consideration has been given to the strain on health services that this housing growth will bring, and how this will be mitigated.

There appears to be no plan for mitigating the impacts of housing growth on healthcare facilities, and therefore the JSP fails to fulfil its Duty to Cooperate under the Town and Country Planning regulations (2012), S33A.

**Q4. Please set out what modification(s) you consider necessary to make the Joint Spatial Plan legally compliant or sound, having regard to the matter you have identified at Q3 above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at Examination.) You will need to say why this change will make the Joint Spatial Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

A new section is required critically that must:

- Evaluate the current capability of health provision against target standards by NHS England (including measures against key performance capacity standards such as patients per full-time equivalent GP)
- Set out what additional capacity is necessary to support the growth

Each of the Strategic Development Policies (7.1 and 7.3 to 7.12) should explicitly state what will be provided in terms of healthcare facilities