

Filtered Data Export

**Full name:**

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**Organisation (where relevant):** Torbay and South Devon NHS Trust (One Devon)  
Integrated Care Board

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP07

**1(b). Does your comment relate to one of the changes listed in the table above?:** Yes

**2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.:**

1. The plan does not properly integrate statutory health infrastructure considerations  
The IDP includes only limited primary care projects and omits many essential schemes in major settlements, despite extensive evidence provided by NHS Devon in January 2023. This risks failing to meet the NPPF's requirement to plan positively for infrastructure (NPPF paras 20, 34).

2. Lack of clear mechanisms to secure developer contributions for primary care SP07 contains general provisions, but most allocations lack site-specific and enforceable health obligations, creating uncertainty over how necessary capacity will be secured in line with NPPF para 57.

3. Failure to treat NHS Devon ICB as a named infrastructure delivery partner The IDP omits NHS Devon ICB as a key stakeholder, raising concerns regarding compliance with the duty to plan for necessary health services.

4. Ignoring previously submitted statutory evidence The plan does not incorporate the detailed primary care capacity evidence provided on 12 January 2023, which includes population, capacity, and mitigation/expenditure methodologies. This undermines proper evidence-based plan-making and risks non-compliance with NPPF paragraphs on infrastructure planning.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have**

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**Modification 1 — Introduce a dedicated Health Infrastructure Policy (or commit to a Health SPD) This should set out:**

- how health requirements will be assessed and costed,
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- mechanisms for delivery and maintenance aligned with housing trajectories.

**Modification 2 — Update the IDP**

- Add NHS Devon ICB as a named stakeholder.
- Include all necessary primary care expansion schemes across the district, not only those currently listed (Pinhoe, Seaton, Marcombe).

**Modification 3 — Strengthen enforceability of primary care obligations Ensure both strategic and non strategic allocations contain clear, specific health-sector mitigation requirements tied to development scale and phasing.**

**3. Do you consider that this part of the Spatial Strategy chapter is sound?: No**

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:**

1. Not Positively Prepared The plan does not account for the full primary care infrastructure required to support planned population growth across multiple settlements (e.g., Exmouth, Topsham, Broadclyst, Honiton, Colyton, Cranbrook, Matford). Most allocations rely solely on general SP07 wording.
2. Not Justified (insufficient evidence used) NHS Devon's 2023 evidence on capacity, need, and mitigation has not been used in preparing the IDP or allocation-specific requirements. The omission of major required schemes indicates incomplete evidence informing the strategy.
3. Not Effective (no clear delivery mechanism) There is no robust district-wide mechanism for securing contributions or ensuring timely delivery of primary care infrastructure. Relying on ad-hoc site-by-site negotiation risks cumulative shortfalls.
4. Not Consistent with National Policy The plan does not fully comply with NPPF paragraphs 20, 34 and 57 which require:

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**4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** Although the response does not explicitly state a DtC breach, it highlights that key NHS evidence was ignored, and NHS Devon ICB is not properly referenced as a partner in the IDP. This suggests inadequate constructive engagement on a strategic matter—health infrastructure.

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**Full name:**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS01

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here.:**  
Marlcombe

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** No

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