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26 January 2026

With Reference to: Second Regulation 19 Local Plan Consultation (Nov 2025 to Jan 2026)

Dear Planning Policy Team,

Dear Sir/Madam,

NHS Devon Integrated Care Board (ICB) has reviewed the Second Regulation 19 Local Plan Consultation (Nov 2025 to Jan 2026) to assess whether its policies adequately support developer contributions towards primary care infrastructure and align with the National Planning Policy Framework (NPPF).

Key Observations:

Strategic Policy SP07 (Delivery of Infrastructure) appropriately requires new development proposals to:

- Assess infrastructure needs arising from development.
- Provide or contribute to necessary improvements through direct provision or financial contributions.
- Deliver infrastructure in parallel with development.
- Coordinate with service providers and secure long-term maintenance via planning conditions or obligations (S106).

Health facilities are referenced in the Infrastructure Delivery Plan (IDP) and Marlcombe new community policy (WS01), which includes an Integrated Neighbourhood Health Centre as required infrastructure.

The plan states compliance with the December 2023 NPPF, which mandates:

- Strategic policies to set out an overall development strategy (para 20).
- Infrastructure delivery planned alongside development (para 34).

- Use of planning obligations to mitigate development impacts (para 57).

SP07 and SP08 (Phased Delivery) meet these requirements by ensuring timely provision, coordination for phased schemes, and legal mechanisms for delivery.

Marlcombe allocation (WS01) goes beyond NPPF expectations by requiring:

- A comprehensive Infrastructure Delivery Strategy linked to phasing and financial appraisal.
- Pooled and retrospective contributions for forward-funded infrastructure.
- Explicit inclusion of health facilities.

Concerns:

While Marlcombe references health provision, smaller allocations and other settlements lack explicit policies for primary care infrastructure. They rely on general wording in SP07 and the IDP, creating a risk that cumulative growth will erode existing capacity without mitigation.

The latest plan iteration appears to disregard NHS Devon's detailed evidence submitted on 12 January 2023, which included:

- Population growth forecasts.
- Capacity assessments for named GP practices.
- Mitigation measures and developer contribution methodologies.

The IDP lists only limited primary care projects (e.g., Pinhoe GP extension, Seaton Hospital PCN space, Marlcombe Health Hub) and omits multiple schemes needed for Exmouth, Topsham, Broadclyst, Honiton, Colyton, Cranbrook and Matford.

Recommendations:

To ensure the Local Plan is positively prepared and effective, we strongly recommend:

1. Introduce a dedicated health infrastructure policy or, at minimum, a Supplementary Planning Document (SPD) for healthcare provision, setting out:
 - a. How requirements will be identified and costed.
 - b. The approach to securing developer contributions (S106, CIL) for all sites.
 - c. Delivery mechanisms and phasing aligned with housing trajectories.
2. Update the IDP to:
 - a. Include NHS Devon Integrated Care Board as a named stakeholder.
 - b. Add all necessary primary care capacity schemes for planned growth areas.
3. Ensure clarity and enforceability of health infrastructure obligations for both strategic and smaller sites.

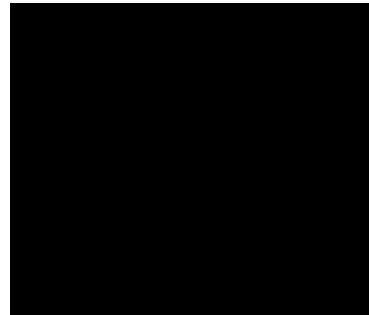
Thank you for considering these points.



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