

Exeter Plan Examination

Matter 13 (Health and Wellbeing) and Matter 14 (Infrastructure)

Trust Submission – Policy HW1 and Healthcare Infrastructure

1. Introduction

The Trust welcomes the constructive engagement with Exeter City Council in relation to healthcare infrastructure and developer contributions, including the discussions held at the Inspector-led round table sessions and the subsequent position statement.

The Trust supports the Council's overall direction of travel in adopting an evidence-led and flexible approach to Policy HW1, as well as the commitment to ongoing joint working to agree an appropriate methodology for securing contributions.

The comments set out below are intended to build on this positive position and provide targeted refinements to ensure the Plan is effective, consistent with national policy, and capable of implementation following adoption.

2. Policy HW1 – Supporting Text

To provide clarity for applicants and decision-makers, and to ensure that the role of healthcare infrastructure is clearly understood within the planning process, the Trust recommends the inclusion of additional supporting text within Section 14.

Suggested additions:

- 14.x New residential development generates increased demand for healthcare services. Without appropriate planning and investment, this can place pressure on existing NHS infrastructure and affect the ability of services to provide timely and equitable access to care.
- 14.x Development proposals should consider the capacity of NHS health infrastructure at an early stage and identify proportionate measures to address impacts arising from population growth. This includes ensuring appropriate access to primary, community and acute healthcare services.
- 14.x Where existing healthcare infrastructure is insufficient to meet additional demand, contributions may be sought towards the provision, expansion or enhancement of NHS health infrastructure, where supported by appropriate evidence.
- 14.x Access to healthcare services should be considered alongside wider principles of sustainable development, including the location of services, connectivity by walking, cycling and public transport, and reducing health inequalities.

This additional narrative would complement the Council’s proposed case-by-case, evidence-led approach, and assist in demonstrating how development impacts on healthcare services can be appropriately mitigated.

3. Policy Wording – Strategic Approach

The Trust supports the proposed modification to Policy HW1 and suggests the following refinement to provide clarity and consistency:

“Contributions towards NHS healthcare infrastructure will be sought where justified by appropriate evidence and where they meet the relevant regulatory and national policy tests.”

This reflects the agreed position that contributions should be:

- evidence-based
- assessed on a case-by-case basis
- compliant with Regulation 122 of the Community Infrastructure Levy Regulations

and ensures that healthcare infrastructure is clearly recognised as an integral component of the infrastructure required to support growth.

4. Definition of NHS Health Infrastructure

To support consistent interpretation and implementation of the policy, the Trust recommends the inclusion of a definition within the Plan glossary.

Suggested definition:

NHS health infrastructure refers to the NHS-funded or NHS-commissioned facilities, services, workforce, and supporting systems required to deliver prevention, diagnosis, treatment, rehabilitation, and ongoing healthcare to the local population.

This includes:

- Primary care (GP practices and primary care networks)
- Community health services (community hubs, therapy services)
- Acute and specialist services (hospitals, diagnostic centres)
- Supporting estate and digital infrastructure required for service delivery

This aligns with the Council’s proposed approach to clarifying the definition of health infrastructure within the Plan.

5. Clarification of Policy Approach (Paragraph 3.3)

The Trust recognises and supports the Council's ambition to promote health and wellbeing, including addressing the wider determinants of health through the planning system.

However, following discussion at the examination round table sessions, it would be beneficial to further clarify the role of NHS healthcare infrastructure within this framework.

As currently expressed, paragraph 3.3 places emphasis on the broader public health and wellbeing agenda. While this is an important aspect of sustainable development, it is also important to ensure that this does not create ambiguity regarding the distinct role of healthcare infrastructure in addressing development-related impacts.

To ensure alignment with national policy and the statutory tests for planning obligations, the Trust considers that it would be helpful to clarify that:

- NHS healthcare infrastructure is required to mitigate the direct impacts of development on healthcare services, and
- wider public health and wellbeing interventions are complementary to, but do not replace, this role

This clarification will:

- support consistency with Regulation 122
- ensure that development-related impacts on NHS services are appropriately addressed
- provide greater certainty for applicants and decision-makers

6. Contributions Methodology

The Trust welcomes the establishment of the Section 106 health contributions working group and the Council's commitment to agreeing a methodology.

Given that a draft methodology has already been prepared, the Trust supports continued collaborative working to finalise this approach. Progressing this work at pace will help ensure that:

- the policy framework is fully operational at the point of adoption, and
- development impacts can be addressed in a timely and proportionate manner

7. Strategic and Site-Specific Infrastructure

The Trust recognises that secondary (acute) healthcare infrastructure serves a wide catchment and operates at a strategic and sub-regional scale.

However, this does not preclude the ability to identify and mitigate the development-related impacts arising from new housing growth.

New development generates additional, quantifiable demand for healthcare services, which can be evidenced through population growth and utilisation rates. This additional demand is cumulative across multiple developments but arises directly from each individual scheme.

In this context, the Trust's approach to contributions seeks to:

- identify the incremental impact of individual developments, and
- ensure that mitigation is proportionate, evidence-based, and directly related to that impact

This approach is consistent with:

- the requirements of Regulation 122, and
- established practice in other infrastructure sectors (e.g. education), where contributions are routinely secured towards infrastructure that also operates at a strategic scale.

The Trust therefore considers that the strategic nature of healthcare infrastructure and the use of site-specific developer contributions are not mutually exclusive, and that both approaches form part of a balanced and effective infrastructure funding framework.

8. Infrastructure Delivery Plan (IDP)

The Trust welcomes the Council's commitment to reviewing and updating the Infrastructure Delivery Plan, including the inclusion of healthcare infrastructure projects.

To further strengthen alignment with the Plan, the Trust recommends that the IDP clearly recognises secondary (acute) healthcare infrastructure as an essential component of supporting sustainable growth, rather than a discretionary or desirable element.

This will:

- support delivery of the Plan's growth strategy
- ensure alignment with health and wellbeing objectives

- contribute to addressing health inequalities

9. Summary

The Trust considers that the proposed refinements:

- Build on the Council's positive and collaborative approach
- Provide clarity in how healthcare infrastructure will be addressed through the planning process
- Ensure alignment with national policy and Regulation 122
- Support effective and timely delivery of infrastructure required to meet the needs of a growing population

The Trust remains committed to working collaboratively with the Council to finalise these elements and to support the successful delivery of the Exeter Plan.