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29 January 2026

Reference: Draft Torbay Local Plan 2025-2045 – Consultation Response

Dear Sir/Madam,

On behalf of NHS Devon Integrated Care Board (ICB) and Torbay and South Devon NHS Foundation Trust, we welcome the opportunity to comment on the draft Torbay Local Plan 2025-2045.

Following the continual engagement between the Council and the NHS we strongly support the Plan's vision of creating a healthy, happy and prosperous Torbay and welcome its emphasis on health, wellbeing and inclusive communities as integral to sustainable development.

Positive Aspects for Healthcare Provision

1. Alignment with National Planning Policy Framework (NPPF)
 - The Plan reflects NPPF paragraph 20 and paragraph 93, which require strategic policies to make sufficient provision for community facilities, including health infrastructure and to promote healthy, safe communities.
 - The presumption in favour of sustainable development (NPPF para 11) and the tests of soundness (para 36) are clearly embedded, ensuring health is treated as essential infrastructure.
2. Integration of Planning Practice Guidance (PPG)
 - The Plan aligns with PPG on “Healthy and Safe Communities¹”, which advises that planning should support strong, vibrant and healthy communities by improving health, reducing health inequalities and creating environments that support active lifestyles.

¹ <https://www.gov.uk/guidance/health-and-wellbeing>

- The inclusion of Policy SC1: Public Health and Wellbeing and requirements for Health Impact Assessments in major developments reflect best practice in PPG.

3. Consistency with NHS England Guidance

- The Plan supports principles set out in Health Building Note 00-08: Addendum 2 – A Guide to Town Planning for Health Organisations², which encourages early engagement with planning authorities to secure developer contributions for health infrastructure.
- The recognition of Torbay Hospital as a sub-regional healthcare hub and provision for key worker accommodation aligns with NHS England’s Estates and Infrastructure Strategy and the ICS planning guidance for integrated care systems.

4. Infrastructure and Developer Contributions

- We welcome Policy SC5 and Strategic Policy IN1, which ensure that major developments contribute to healthcare infrastructure proportionate to demand. This is critical to maintaining service capacity as Torbay grows.
- The Plan’s explicit reference to safeguarding and improving strategic health services, particularly Torbay Hospital and supporting key worker accommodation is highly positive.

5. Future Growth Areas and Health Integration

- The Torquay Gateway and Newton Road to Torre regeneration corridor policies (SDT2 and SDT3) prioritise safeguarding Torbay Hospital and improving healthcare facilities.
- Future Growth Areas such as Collaton St Mary and Long Road/Yalberton include provision for community facilities and green infrastructure, supporting healthy living environments.
- Recognition that population growth is entirely driven by inward migration, predominately older people with higher health needs.

Our Position

The NHS recognises that planned housing growth plays a critical role in supporting the long-term sustainability of healthcare services. Delivery of a sufficient and appropriate mix of housing, including open market homes and genuinely affordable key worker accommodation, is essential to attract and retain the future healthcare workforce required to serve Torbay’s growing and ageing population.

² <https://www.england.nhs.uk/wp-content/uploads/2021/05/hbn08-addend2.pdf>

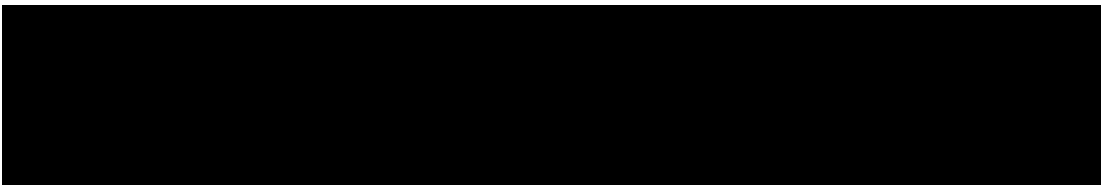
Modern health services rely on a broad range of staff groups, including lower paid NHS support workers, who are particularly affected by local housing affordability pressures.

Ensuring access to suitable housing therefore directly supports workforce resilience, service capacity and the effective operation of strategic healthcare infrastructure such as Torbay Hospital and community health services. In this respect, housing delivery is intrinsically linked to the NHS's ability to meet future care needs and should be viewed as a supporting component of health infrastructure planning.

The NHS supports the draft Local Plan's strategic approach to health and wellbeing and its recognition of healthcare as essential infrastructure. We look forward to continued collaboration to ensure that:

- Healthcare contributions via S106 are secured in line with population growth and service demand, consistent with CIL Regulation 122 tests.
- Masterplans for Future Growth Areas incorporate health facilities and connectivity to Torbay Hospital and Primary Care Networks (PCN).
- Health Impact Assessments are embedded in major development proposals to mitigate risks and optimise health outcomes.

We commend Torbay Council for embedding health in the planning framework and stand ready to work in partnership to deliver the Plan's vision.



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