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BY ONLINE SUBMISSION ONLY

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RE: Consultation on draft Health Impact Assessment Supplementary Planning Document

Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS) for and on behalf of NHS Cambridgeshire and Peterborough ICB (C&P ICB). C&P ICB has delegated authority from NHS England for the commissioning of most NHS health services in the Greater Cambridgeshire area. This includes consideration of estate requirements to deliver these services.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing adds further pressure to the system. Residential developments often have very significant impacts in terms of the need for additional healthcare provision for future residents, particularly primary care. To ensure the delivery of necessary health infrastructure, it is essential that new development makes a proportionate contribution to funding the health infrastructure needs arising from new homes.

Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Detailed Comments on draft Health Impact Assessment SPD

The Health Impact Assessment SPD details the method of assessing the impacts of development on health and wellbeing. We support the level of detail and guidance that has been provided within the draft SPD but would note that the (currently in draft) Planning Obligations SPD has not been referenced to within the draft Health Impact Assessment SPD.

Chapter 22 of the Planning Obligations SPD contains detailed guidance on the method to assessing impact on local health provision. We would recommend that the Health Impact Assessment SPD clearly set out that the guidance contained within the Planning Obligations SPD should be followed when assessing the capacity of health infrastructure, to ensure that there is consistency within the local area when assessing impact on health and wellbeing, specifically on healthcare provision.



Alongside the importance of consideration at the early stages, we would also recommend that there is commitment to engagement with the Cambridge and Peterborough Integrated Care Board (C&P ICB) at the early stages to accurately determine the potential impact of development on health provision and infrastructure and enable the appropriate delivery of healthcare infrastructure. C&P ICB is the health commissioning body within the Greater Cambridgeshire area and is therefore best placed to be able to assess the likely impact of proposals on healthcare infrastructure capacity within the locality. These amendments will ensure the Health Impact Assessment SPD provides sufficient detail to guide the method of assessing the impact on local health and wellbeing.

Conclusion

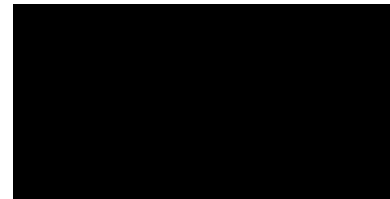
Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area. We support the approach of the draft Health Impact Assessment SPD but consider the suggested amendments above will contribute to ensuring the SPD reflects adopted health commissioning standards and that an accurate assessment of health infrastructure can be conducted.

Should you have any queries or require any further information, please do not hesitate to contact us.

Yours sincerely,



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NHS Cambridge and Peterborough ICB



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Town Planning Partner
NHS Property Services

For and on behalf of NHS Cambridgeshire and Peterborough ICB