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Publication Dudley Local Plan (Regulation 19) Consultation

ATTACHMENT

Chapter 7: Health & Wellbeing

Policy DLP 9 Healthcare Infrastructure

The ICB supports the Health Infrastructure section of the Local Plan in its expression of stakeholders committing to change at a whole systems level and to working together to achieve a sustainable and resilient Dudley, with citizens involved at every level of governance for health and wellbeing. This can be achieved by determining the right proportion of resource that is committed to delivering prevention, treatment and care for health and wellbeing through the following:

- The first priority should be to addressing the integration of health and care systems. It includes harnessing the available information and intelligence into a more complete picture. This will strengthen the relationships between the organisations involved, to develop more seamless and co-ordinated responses to health and wellbeing needs. It will also ensure that the community gets the best value and outcomes possible from the local health care economy and infrastructure.
- A commitment to addressing improvements to the determinants of health within South Staffs such as housing, education, employment, active lifestyles and transport.
- Evolving a population that is equipped with the right skills to be informed about health, care and wellbeing and also be able to access and navigate systems to appropriate self-care or services for themselves and others.

In summarising the key health impacts identified through the Policy drafting process, the ICB is of the opinion that the Draft Dudley Local Plan makes a positive contribution to addressing the identified health issues. *Policy DLP 9 Healthcare Infrastructure* in particular is supported for recognising the connection between housing development, local population change and their potential impact on the Primary and Secondary Healthcare Network.

It is acknowledged that developer contributions can affect the financial viability of certain developments and will therefore not always be appropriate or reasonable to apply. The ICB would not wish to support the imposition of a regime that would see the viability of development compromised by such contributions.

However, based on an independent viability assessment, the ICB suggests that developer contributions for Healthcare infrastructure could be deferred or discounted where this would not make the development unacceptable in planning terms. This would retain a degree of flexibility in applying the standard contributions/charges where affordability based on development viability is clearly demonstrated, without compromising the planning necessity for identified infrastructure and facilities.

Where developer contributions are deferred the ICB would support Dudley Council potentially applying clauses in Planning Obligations relating to deferred contributions, which will seek to recover all or part of the discount in circumstances where the financial climate and economic viability of the development improves. Here, any recaptured discount will be limited to the full standard developer contributions for the Healthcare infrastructure applicable at the time the planning obligation for a development was signed.

The ICB also would support the emphasis in the first paragraph of Policy HC14 and its requirement for Applicants to consult the ICB in advance of the submission of a planning application where a significant amount of housing is to be provided.

The ICB also supports the intention to produce separate guidance as part of an SPD, on the methodology used for calculating the appropriate level of developer contributions. To this end, a draft SPD is attached for the Council's consideration.