

Our Ref: PW/TLR/FOI/0126/1575

2nd February 2026

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Leonard Coates Way
Hanley
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ST1 4FA

Telephone: 0300 123 1461

Sent by email

Dear

FOI/0126/1575

Your request for information under the Freedom of Information Act 2000

Thank you for your email dated Friday 30th January 2026 requesting further clarification regarding the evidence base underpinning the ICB's position.

An anonymised copy of this response will be made publicly available on the ICB website. The ICB's response is provided below in [blue](#) text.

You have requested clarification on:

1. Evidence Supporting the Conclusion That Impacts Can Be Accommodated
Your response states that the ICB has considered the impact of the proposed development and that primary care services can serve the development "at this time". Could you please confirm:

- **What patient generation assumptions (e.g. residents per dwelling, age profile, consultation rates) were applied in reaching this conclusion?**
- **Whether any GP practice list size, capacity or headroom analysis was undertaken for practices serving Woodseaves;**
- **Whether any assessment was undertaken of emergency or urgent care demand arising from the proposed development, alone or cumulatively with other planned housing growth in the locality.**

2. Thresholds for "Material" Healthcare Impact

Your response refers to mitigation being sought where healthcare impacts are considered "material".

Please could you clarify:

- **What criteria or thresholds the ICB applies when determining whether a development's healthcare impact is "material" for planning purposes;**
- **Whether such thresholds are numerical, capacity-based, or policy-based;**
- **At what scale or circumstance healthcare mitigation would typically be requested through Section 106 or other planning mechanisms in rural areas.**

3. Relationship Between System Pressure and Planning Growth

Your response confirms that:

- **Royal Stoke University Hospital is the principal major emergency centre with a full 24/7 consultant-led A&E;**

- **University Hospitals of North Midlands NHS Trust has declared a Critical Incident due to system-wide pressures;**
- **Future mitigation relies in part on service transformation and “left shift” models which require time, workforce and infrastructure to scale.**

In this context, I would be grateful if you could clarify:

- **Whether the ICB considers it appropriate for additional population growth to be approved in locations served by a single pressured emergency provider in the absence of secured, funded mitigation;**
- **Whether healthcare system pressures and resilience are treated as material considerations in ICB planning consultations, and if so, how this is reflected in advice to local planning authorities.**

4. Planning Consultation Record

Finally, for completeness, could you confirm:

- **Whether the ICB provided a formal written consultation response to Stafford Borough Council in respect of application 25/40683/OUT;**

If so, whether that response can be made publicly available as part of the planning file

Under the Freedom of Information Act (FOIA), the Integrated Care Board (ICB) is required to disclose recorded information that it holds at the time a request is received, subject to any applicable exemptions. The FOIA does not require public authorities to provide explanations, interpretations, justifications, opinions, or to engage in ongoing dialogue or debate about the meaning, adequacy, or implications of information that has already been disclosed.

1. With regard to your questions relating to patient generation assumptions, capacity modelling, thresholds for “material” impact, and the appropriateness of population growth in the context of system pressures, the ICB does not hold any recorded document or dataset that sets out the type of analytical detail you describe for this individual planning application. The position communicated in our response reflects the ICB’s role in the planning process and is based on available system intelligence. To the extent that this judgement is not captured in a discrete, releasable record, it does not constitute information held for the purposes of the FOIA. Kindly note that FOIA does not oblige the ICB to retrospectively create analysis or to provide narrative explanations to support or defend its professional views.
2. The ICB does not hold formalised numerical thresholds or universal criteria defining when healthcare impacts become “material” for planning purposes.
3. Information held by the ICB regarding system pressures, including the declaration of a Critical Incident by University Hospitals of North Midlands NHS Trust, has already been addressed in our original response. Questions as to whether further development should or should not be approved in light of these pressures seek an expression of opinion rather than access to recorded information and therefore fall outside the scope of the FOIA.
4. As previously confirmed, the ICB was consulted on Planning Application 25/40683/OUT. The ICB does not hold a separate publicly releasable record beyond the information that has already been disclosed.

We are satisfied that the response issued on 30 January 2026 meets the ICB’s obligations under the FOIA. Where information is held in a recorded, releasable format, it has been

provided. Where it is not held, or where questions seek clarification, interpretation, or opinion, the Act does not require further response.

Should you require any further information or clarification regarding this response please do not hesitate to contact us. If you are dissatisfied with the response, you are entitled to request an internal review which should be formally requested in writing and must be within two calendar months from the date this response was issued.

To request an internal review

You can request an internal review by contacting the Staffordshire and Stoke-on-Trent ICB FOI team by emailing; staffsstokeFOI@staffsstoke.icb.nhs.uk or by post to the address at the top of this letter within 40 working days of the initial response.

If you are not content with the outcome of your internal review, you may apply directly to the Information Commissioner's Office (ICO) for a decision. Generally, the ICO cannot make a decision unless you have exhausted the Staffordshire and Stoke-on-Trent Integrated Care Board's FOI complaints procedure.

The ICO can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.gov.uk

Yours faithfully

Paul Winter
Associate Director of Corporate Governance