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11th December 2013

Dear Mr Rand

Planning Application by the North West Haverhill Consortium of Landowners for Mixed Use Development (including up to 1,150 dwellings) on Land North West of Haverhill, Anne Sucklings Lane, Little Wratting (Ref: SE/09/1283) – Further Consultation Response of NHS Property Services Ltd

1. We write in response to your email dated 28th November 2013, requesting an update on the position of NHS Property Services Ltd (NHSPS) in respect of the above planning application, and advise that NHSPS, on behalf of NHS England (NHSE), wishes to re-state its holding objection to the application.
2. Please note that NHSE commissions all healthcare services, incorporating the provision of primary healthcare facilities within its administrative area, including within St Edmundsbury Borough.

Background

3. The previous consultation response submitted by NHS Suffolk (dated 25th June 2010) included a calculation of the likely revenue funding implications arising as a result of the proposed development. However, it should be noted that since submitting the previous response, and in light of the healthcare priorities arising from the Health and Social Care Act (2012), the NHS now requires development impacts to be mitigated by capital funding. Therefore, a revenue contribution is no longer being sought in this instance.
4. The current consultation response, which supersedes the 2010 response, provides an update on the capital funding implications arising from the proposed development.

Updated Healthcare Impact Assessment

Capital Funding Implications of the Proposed Development

5. Table 1 below provides a summary of the capacity position for the GP Catchment Practices once the additional staffing and floorspace requirements arising from the development proposal are factored in, including an estimate of the costs for providing new floorspace and/or related facilities. The costs for additional car parking capacity are not addressed in the table as NHSPS has yet to undertake a detailed audit of the transportation position.

6. A copy of the GP Catchment Plan, identifying the location of the GP Practices serving the proposed development, which was submitted with the 2010 consultation response, is *attached* to this letter.

Premises	List Size (Oct 2013)	GP WTE ¹	Capacity ²	Spare Capacity ³	Additional Population Growth (1,150 dwellings) ⁴	Additional GPs Required to Meet Growth ⁵	Additional Floor Area Required to Meet Growth (m ²) ⁶	Capital Required to Create Additional Floor space (£) ⁷
Christmas Maltings Surgery, Camps Road, CB9 8HF	10,314	4.8	8,640	-1,674	1,380	0.77	100.1	£200,200
Stourview Medical Centre, Crown Passage, High Street, CB9 8AG	3,988	2	3,600	-388	1,380	0.77	100.1	£200,200
Total	14,302	6.8	12,240	-2,062	2,760	1.54	200.2	£400,400

Notes:

1. The number of whole time equivalent GPs based at the practice.
2. Based on the optimum list size of 1,800 patients per GP.
3. Based on current list size.
4. Calculated using the St Edmundsbury Borough average household size of 2.4 as set out in the 2011 Census Table "Rooms, bedrooms and central heating, local authorities in England and Wales".
5. Additional growth divided by GP list size capacity (1,800 patients).
6. Based on 130m² per GP as set out in NHS approved business cases incorporating DH guidance within "Health Building Note 11- 01: Facilities for Primary and Community Care Services".
7. Based on standard m² cost multiplier for primary healthcare facilities in the East Anglia Region from the BCIS Q1 2013 Price Index, adjusted for professional fees, fit out and contingencies budget (£2,000/ m²), rounded to nearest £.

7. As shown in Table 1, there is an overall capacity deficit in the catchment surgeries and a developer contribution of **£400,400**, required to mitigate the 'capital cost' to the NHS for the provision of additional healthcare services arising directly as a result of the development proposal, is sought.
8. NHSE therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission, in the form of a Section 106 Agreement.

Developer Contribution Required to Meet the Cost of Additional Capital Funding for Health Service Provision Arising

9. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework (NPPF) and the CIL Regulations, which provide for developer contributions to be secured to mitigate a development's impact, a financial contribution of £400,400 is sought.
10. This contribution would facilitate the provision, fit out and equipping of the floorspace required to bring forward a new (developer funded) Health Centre of approximately 200 m² on the site, potentially within the proposed Local Centre, which would be subject to NHS Business Case approval procedures. The health centre would need to be constructed, fitted out and equipped to an appropriate specification to be agreed.
11. In the event that an NHS Business case is not confirmed for new floorspace provision, the financial contribution would be required to increase capacity within the catchment surgeries through refurbishment, reconfiguration, extension and re equipping as appropriate.
12. This healthcare mitigation should be included as a Section 106 Head of Term of Agreement in association with the proposals, and secured as part of a planning obligation linked to any grant of planning permission for the proposed development, with appropriate triggers to be agreed.
13. NHSE is satisfied that the basis and value of the developer floorspace provision and contribution sought, is consistent with the policy and tests for imposing planning obligations set out in the NPPF and in Section 122 of the CIL Regulations, which require the obligation to be a) necessary to make the development acceptable in planning terms, b) directly related to the development and c) fairly and reasonably related in scale and kind to the development.

Conclusion

14. In conclusion, on behalf of NHSE, NHSPS raises a holding objection to the proposed development on the grounds that the applicant has not proven that the application fully delivers sustainable development, as it does not assess the likely healthcare impacts of the development or provide for the necessary mitigation.
15. On this basis, the application is considered to conflict with the provisions of the Development Plan, which seek to achieve sustainable development and provide for the necessary physical and social infrastructure (and funding) to support residential development. Specifically, it is considered to be inconsistent with Policy CS14 (Community Infrastructure Capacity and Tariffs) of the St Edmundsbury Core Strategy (2010).
16. The application is also considered to conflict with the intentions and objectives of national guidance and other material considerations set out in the NPPF (with its presumption in favour of sustainable development) and the Forest Heath and St Edmundsbury Joint Development Management Policies Submission Document (October 2012). Specifically, it is considered to be inconsistent with:

- Paragraphs 17, 69, 70, 156, 162 and 196 of the NPPF; and,
- Policy DM41 of the draft Joint Development Management Policies Document.

17. Notwithstanding the above, NHSPS would be content to lift its objection in the event that an appropriate level of mitigation is proposed by the applicant and secured through a Section 106 Agreement.

18. In this respect, it is considered that a developer contribution of £400,400 to facilitate the provision, fit out and equipping of a new health centre, or alternatively for increasing capacity within the existing GP catchment surgeries (as determined by NHS Business Case approval procedures), would fairly and reasonably address the identified healthcare impacts.

19. NHSPS and NHSE look forward to working with the applicant and the District Council to satisfactorily address the issues raised in this letter and would appreciate acknowledgment of its safe receipt.

Yours sincerely,

For and on behalf of:

Mark Marshall (Head of Corporate Development and Infrastructure – Suffolk)

Encl.

GP Catchment Area Plan
(2km radius from centre of application site)

