

Application Reference: 22/00201/OUT

Description: Outline planning application for the erection of up to 102 dwellings, new vehicular and pedestrian access, and associated works. All matters reserved except for access. At (OS 8894 6544), Kidderminster Road, Hampton Lovett

Herefordshire and Worcestershire ICB's Consultation Response and Regulation 122 CIL compliance statement in respect of the above planning application

Primary Care Services in the Droitwich area

The above development impacts the following surgeries within the Droitwich, Ombersley and the Rurals Primary Care Network (PCN):

- Corbett Medical Practice
- Spa Medical Practice
- Salters Medical Practice

The current and previous list sizes (raw) for each are detailed below:

Practice	Oct-17	Oct-22	% change
Corbett Medical Practice	12,415	14,025	+13%
Salters Medical Practice	9,212	8,795	-5%
Spa Medical Practice	9,181	10,624	+16%

This development would present an estimated increase in population of 245 residents. Although this increase would appear fairly insignificant across the 3 Practices, we must ensure that we are not treating each new development application in isolation when it comes to applying for Section 106 funding. Otherwise, there is a risk that multiple developments (that might seem small in scale individually) will cumulatively cause a capacity and access problem for primary medical services. Therefore, it is important that Primary Care access is considered for each development application, no matter how small.

Issues in General Practice in terms of space

Additional population growth and expanding housing developments do create capacity issues within local General practice in terms of the additional staffing required to deliver patient services and the associated clinical space to accommodate additional staff.

Based on the NHS space calculator, it would suggest that all 3 Practices have sufficient space for their current patient population. However, the configuration of the buildings and the current number of clinical rooms at both Corbett and Spa is now insufficient due to a 13% and 16% increase in the Practice patient list size in the last 5 years.

It needs to be noted that the NHS space calculator is a fairly outdated tool now, and does not take into consideration the fact that, since July 2019, GP Practices have been required to work collaboratively as Primary Care Networks and are responsible collectively for delivering additional services under the Primary Care Networks Directed Enhanced Service. These additional services also require extra staff to be employed under the Additional Roles Scheme. As an example, the Droitwich, Ombersley and the Rurals Primary Care Network have employed an additional 17 staff since the introduction of the additional roles scheme in July 2019, and all these staff require accommodation within a Practice, or across several Practices. By being able to expand space within the Practices, this

will help to expand local GP services, but also enhance the additional services on offer as a Primary Care Network.

The Corbett Medical Centre is already struggling for physical space to serve patient needs because of its increasing patient list over the last 5 years. There is a project to build an additional wing onto the building for additional consulting rooms. By supporting Corbett Medical Practice with their plans, this would also enable them to become a central hub for the additional roles staff and centralise some services for all 3 Practices, and thus releasing more capacity at the 2 other Practices. There are also alternative projects to expand space at the Salters Medical Centre and Spa Medical Centre.

Planning Policy and Guidance

NPPF (2021) para 8 promotes social objectives including ensuring support strong, vibrant and healthy communities ...with accessible services...that reflect current and future needs and support communities' health, social well-being: .

SWDP Policy 7 (2016) indicates:

.. B. Development will be required to provide or contribute towards the provision of infrastructure needed to support it..

SWDP Policy 62 (2016) indicates planning obligations through Section 106 agreements will continue to be sought to provide funding to mitigate negative impacts relating to specific developments.

Planning for Health SPD (2017)

1.12 The aims and objectives of this Health SPD are as follows:

...To inform...planning applications of any potential health-related issues, and to be a material consideration, where relevant, to be taken into account in determining planning applications...

Calculation

Below is the calculation to show how the funding request is calculated.

Primary Care Network	Additional Population Growth (102 dwellings)¹	Floorspace required to meet growth (m²)²	Capital required to create additional floor space (£)³
Droitwich, Ombersley & The Rurals PCN	245	16.8	38,640

Notes:

1. Calculated using the Herefordshire & Worcestershire District average household size of 2.4 taken from the 2011 Census: Rooms, bedrooms and central heating, local authorities in England and Wales (rounded to the nearest whole number) (1.7 used for retirement living)
2. Based on 120m² per 1750 patients (this is an optimal list size for a single GP). Space requirement aligned to DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
3. Based on standard m² cost multiplier for primary healthcare in the Midlands and East from the BCIS Public Sector Q3 2015 price & cost Index, adjusted for professional fees, fit out and contingencies budget (£2,300/m²).

This funding is needed to go towards the provision of additional consulting rooms at the Corbett Medical Centre in the first instance or alternative projects to expand space at the Salters Medical Centre and Spa Medical Centre which would accord with the overall aims and objectives of the above-mentioned planning policy and guidance.

CIL Regulation 122

The ICB considers that the request made is in accordance with Regulation 122:

“(2) A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—

(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.”

Section 106 of the Town and Country Planning Act 1990 (as amended) allows any person interested in land in the area of a local planning authority, to enter into an obligation requiring a sum or sums to be paid to the authority, which will be used to offset the impact of the development.

The contribution of up to £38,640 (£378.83 per dwelling with average 2.4 persons occupancy) towards the extension of an existing doctor’s premises in the local area to provide additional capacity to accommodate the additional population growth from the development is considered necessary to meet an identified need and is a requirement of both national and local planning policy to ensure necessary infrastructure is provided to mitigate the impact of development.

The provision of additional capacity at a local doctors surgery is directly related to the development of 102 dwellings, generating up to 245 residents which would create a demand for local primary healthcare facilities.

The extension of an existing doctors surgery to accommodate the additional patient demand using a formula-based calculation is considered to be fairly and reasonably related in scale and kind to the development.

Without the requested contribution, access to adequate health services is rendered vulnerable thereby undermining the sustainability credentials of the proposed development due to conflict with the above-mentioned planning policy and guidance.