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Dear Sir / Madam

**Erection of up to 102 dwellings on land at Kidderminster Road, Hampton Lovett
Planning Application 22/00201/OUT**

1.0 Introduction

- 1.1 Thank you for consulting Herefordshire and Worcestershire CCG on the above planning application.
- 1.2 I refer to the above planning application and advise that, further to a review of the applicant's submission, and concurrent with a refresh of the STP Estates Strategy and a more strategic view of developments, the following comments are with regard to the primary healthcare provision on behalf of Herefordshire & Worcestershire Clinical Commissioning Group (CCG).

2.0 Existing Healthcare Position Proximate to the Planning Application Site

- 2.1 The proposed development will be likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. Herefordshire and Worcestershire CCG would therefore expect these impacts to be fully assessed and mitigated.

3.0 Review of Planning Application

- 3.1 A Healthcare Impact Assessment (HIA) has been prepared by Herefordshire and Worcestershire CCG to provide the basis for a developer contribution towards capital funding to increase capacity within the GP Catchment Area.

4.0 Assessment of Development Impact on Existing Healthcare Provision

- 4.1 The development could generate approximately 245 residents and subsequently increase demand upon existing services.
- 4.2 The development would have an impact on primary healthcare provision in the area and the proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

5.0 Healthcare Needs Arising From the Proposed Development

- 5.1 The intention of Herefordshire and Worcestershire CCG is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.
- 5.2 The development would give rise to a need for improvements to access and capacity, in line with emerging ICS estates strategy, by way of new and additional premises or infrastructure, extension to existing premises, or improved digital infrastructure and telehealth facilities.
- 5.3 This housing development falls within the boundary of practices which are members of Droitwich, Ombersley & The Rurals Primary Care Network (PCN) and, as such, a number of services for these patients may be provided elsewhere within the PCN. The CCG would therefore wish to secure the funding for Droitwich, Ombersley & The Rurals PCN for the patients within this vicinity.
- 5.4 The table below provides the Capital Cost Calculation of additional primary healthcare services relating to the development proposal.

Primary Care Network	Additional Population Growth (102 dwellings) ¹	Floorspace required to meet growth (m ²) 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).

- 5.5 A developer contribution will be required to mitigate the impacts of this proposal. Herefordshire and Worcestershire CCG calculates the level of contribution required in this instance directly relating to the number of dwellings to be **£38,640**. Payment should be made before the development commences.
- 5.6 Herefordshire and Worcestershire CCG 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 planning obligation.

6.0 Conclusions

- 6.1 In its capacity as the primary healthcare commissioner, Herefordshire and Worcestershire CCG has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development.
- 6.2 The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development.

- 6.3 Assuming the above is considered in conjunction with the current application process, Herefordshire and Worcestershire CCG would not wish to raise an objection to the proposed development. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.
- 6.4 The terms set out above are those that Herefordshire and Worcestershire CCG deem appropriate having regard to the formulated needs arising from the development.
- 6.5 Herefordshire and Worcestershire CCG is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the National Planning Policy Framework (NPPF).
- 6.6 Herefordshire and Worcestershire CCG looks forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response.

Yours faithfully



Jo Hall
Primary Care Commissioning Manager