

Our Ref: HWEICB/UTT/21/2509/SF

Your Ref: UTT/21/2509/OP

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<https://hertsandwestessex.icb.nhs.uk>

Dear Sir/Madam

**Address:** Land South Of (East Of Griffin Place) Radwinter Road Swards End  
Essex

**Proposal:** Outline application for the erection of up to 233 residential dwellings including affordable housing, with public open space, landscaping, sustainable drainage system (SuDS) and associated works, with vehicular access point from Radwinter Road. All matters reserved except for means of access

## 1.0 Introduction

- 1.1 Thank you for consulting Hertfordshire and West Essex Integrated Care Board (ICB) on the above planning application.
- 1.2 I refer to the above planning application and advise that, further to a review of the applicants' submission the following comments are with regard to the primary healthcare provision on behalf of Hertfordshire and West Essex Integrated Care Board (ICB), incorporating NHS England Midlands and East (East) (NHS England).

## 2.0 Existing Healthcare Position Proximate to the Planning Application Site

- 2.1 The proposed development is likely to have an impact on the services of 2 GP practices operating within the vicinity of the application site. The GP practices do not have capacity for the additional growth resulting from this development.

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2.2 The proposed development will likely 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. Hertfordshire and West Essex Integrated Care Board would therefore expect these impacts to be fully assessed and mitigated.

### 3.0 **Review of Planning Application**

3.1 Hertfordshire and West Essex Integrated Care Board acknowledge that the planning application does include a Health Impact Assessment (HIA), however this does not appear to recognise that a capital contribution may be required to mitigate the primary healthcare impacts arising from the proposed development

3.2 A Healthcare Impact Assessment has been prepared by Hertfordshire and West Essex Integrated Care Board 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 existing GP practices do not have capacity to accommodate the additional growth resulting from the proposed development. The development could generate approximately 582 residents and subsequently increase demand upon existing constrained services.

4.2 The primary healthcare service directly impacted by the proposed development and the current capacity position are shown in Table 1.

**Table 1: Summary position for primary healthcare services within 2km catchment (or closest to) the proposed development**

Premises	Weighted List Size <sup>1</sup>	NIA (m <sup>2</sup> ) <sup>2</sup>	Capacity <sup>3</sup>	Spare Capacity (NIA m <sup>2</sup> ) <sup>4</sup>
The Gold Street Surgery	10,588	542.78	7,916	-183.25
Crocus Medical Practice	12,558	749.41	10,929	-111.71
<b>Total</b>	<b>23,146</b>	<b>1,292.19</b>	<b>18,845</b>	<b>-294.96</b>

#### Notes:

1. The weighted list size of the GP Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
2. Current Net Internal Area occupied by the Practice
3. Based on 120m<sup>2</sup> per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO). Space requirement aligned to DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
4. Based on existing weighted list size

4.3 The development would have an impact on primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in

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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 Hertfordshire and West Essex Integrated Care Board 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 capacity, in line with the emerging Hertfordshire and West Essex Integrated Care Board estates strategies, by way of extension, refurbishment, reconfiguration or potential relocation for the benefit of the patients at Gold Street Surgery, a proportion of the cost of which would need to be met by the developer.
- 5.3 Table 2 provides the Capital Cost Calculation of additional primary healthcare services arising from the development proposal.

**Table 2: Capital Cost calculation of additional primary healthcare services arising from the development proposals**

Premises	Additional Population Growth (233 dwellings) <sup>5</sup>	Additional floorspace required to meet growth (m <sup>2</sup> ) <sup>6</sup>	Spare Capacity (NIA) <sup>7</sup>	Capital required to create additional floor space (£) <sup>8</sup>
Gold Street Surgery	582	39.91	-183.25	119,730
<b>Total</b>	<b>582</b>	<b>39.91</b>	<b>-183.25</b>	<b>119,730</b>

### Notes:

5. Calculated using the Uttlesford District average household size of 2.5 taken from the 2011 Census.
6. Based on 120m<sup>2</sup> per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO). Space requirement aligned to DH guidance within “Health Building Note 11-01: facilities for Primary and Community Care Services”
7. Existing capacity within premises as shown in Table 1
8. Based on standard m<sup>2</sup> cost multiplier for primary healthcare in the East Anglia Region from the BCIS Public Sector Q3 2015 price & cost Index, adjusted for professional fees, fit out and contingencies budget (£3,000/m<sup>2</sup>).
- 5.4 A developer contribution will be required to mitigate the impacts of this proposal. Hertfordshire and West Essex Integrated Care Board calculates the level of contribution required, in this instance to be **£119,730**. Payment should be made before the development commences.
- 5.5 Hertfordshire and West Essex Integrated Care Board 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 with full delegation from NHS England, Hertfordshire and West Essex Integrated Care Board 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, Hertfordshire and West Essex Integrated Care Board 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 Hertfordshire and West Essex Integrated Care Board and NHS England deem appropriate having regard to the formulated needs arising from the development.
- 6.5 Hertfordshire and West Essex Integrated Care Board and NHS England are 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 NPPF.
- 6.6 Hertfordshire and West Essex Integrated Care Board and NHS England look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully



**Sue Fodgen**

Assistant Director - Premises

Hertfordshire and West Essex Integrated Care Board

Dr Jane Halpin, Chief Executive

Rt. Hon. Paul Burstow, Chair

