

Mr C Brace  
Case Officer  
Herefordshire Council  
Planning Services  
Box 4  
Hereford HR4 0XH

The Coach House  
John Comyn Drive  
Worcester  
Worcestershire  
WR3 7NS

01905 681999

[hw.enquires@nhs.net](mailto:hw.enquires@nhs.net)

19 November 2020

Dear Mr Brace

**Planning Consultation: 203535**  
**Land to the South of Leadon Way, Ledbury**

**1.0 Introduction**

- 1.1 Thank you for consulting Herefordshire and Worcestershire Clinical Commissioning Group (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 the following comments are with regard to the primary healthcare provision on behalf of Herefordshire and Worcestershire Clinical Commissioning Group (CCG).

**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. The GP practices do not have capacity for the additional growth resulting from this development.
- 2.2 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 existing GP practices do not have capacity to accommodate the additional growth resulting from the proposed development. The development will generate an additional 110 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 is shown in Table 1.

**Table 1:**

**Summary position for primary healthcare services within catchment of (or closest to) the proposed development**

Practice	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>
Market Street Surgery	5,613	175.0	384.89	-209.89
St Katherine's Surgery	9,361	224.5	641.90	-417.40
<b>Total</b>	<b>14,974</b>	<b>399.5</b>	<b>1,026.79</b>	<b>-627.29</b>

**Notes:**

1. The weighted list size of the GP Practice as at 1 April 2020 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 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"
4. Based on existing weighted list size, negative numbers show capacity shortfall

- 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 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 capacity, in line with emerging STP estates strategy, by way of new and additional premises or infrastructure, or extension or alterations to existing premises.
- 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 proposal**

Premises	Additional Population Growth (46 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>
Ledbury practices	110	7.54	-627.29	17,342

**Notes:**

5. Calculated using the Herefordshire and 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).
6. Based on 120m<sup>2</sup> 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"
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 Midlands and East from the BCIS Public Sector Q3 2015 price & cost Index, adjusted for professional fees, fit out and contingencies budget (£2,300/m<sup>2</sup>), rounded to nearest £100.

5.4 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 to be **£17,342**. Payment should be made before the development commences.

5.5 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.

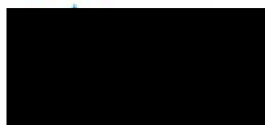
6.3 Assuming the above is considered in conjunction with the current application process, Herefordshire and Worcestershire CCG would not wish to raise an objection to the proposed development. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are 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 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 and would appreciate acknowledgement of the safe receipt of this letter.

Yours sincerely



Jo Hall  
Primary Care Commissioning Manager