



**Please reply to:**

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Email: [Eastkent.primarycare@nhs.net](mailto:Eastkent.primarycare@nhs.net)

17<sup>th</sup> February 2020

Dear Planning Team,

**Re: Outline application for the erection of 250 dwellings.  
Land between Woodchurch Rd and Appledore Rd, Tenterden, Kent**

**Application No: 19/01788**

NHS Ashford Clinical Commissioning Group (CCG) has delegated co-commissioning responsibility for general practice services in Ashford and Tenterden and is the body that reviews planning applications to assess the direct impact on general practice.

I refer to the above outline planning application which concerns the proposed residential development comprising of 250 dwellings.

The CCG has assessed the implications of this proposal on delivery of general practice services and is of the opinion that it will have a direct impact which will require mitigation through the payment of an appropriate financial contribution.

In line with the Planning Act 2008 requests for development contributions must comply with the three specific legal tests:

1. Necessary to make the development acceptable
2. Be directly related to the development
3. Be fair and reasonably related in scale and kind to the development

We have applied these tests in relation to this planning application and can confirm the following specific requirements. The calculations supporting this requirement are set out in below.

	Total Chargeable units	Total	Project
General Practice	250	£190,320	Provision of Health Care Services in the growth area.

The obligation should also include the provision for the re-imbusement of any legal costs in incurred in completing the agreement.

**Justification for infrastructure development contributions request**

The four clinical commissioning groups (CCGs) in east Kent are working together to improve healthcare across their communities.

NHS Ashford CCG - NHS Canterbury and Coastal CCG - NHS South Kent Coast CCG - NHS Thanet CCG

This proposal will generate approximately 585 new patient registrations when using an average occupancy of 2.34 people per dwelling. The proposed development falls within the current practice boundary of Ivy Court Surgery and Woodchurch Surgery. These practices are working in collaboration as part of a Primary Care Network (PCN) to deliver services to the growing population as there is a large amount of growth in the area.

There is currently limited capacity within existing general practice premises to accommodate growth in this area. The need from this development, along with other new developments, will therefore need to be met through the creation of additional capacity in general practice premises; this is highlighted in the CCG GP Estates Strategy. General practice premises plans are kept under regular review as part of the GP Estates Strategy and priorities are subject to change as the CCG must ensure appropriate general medical service capacity is available as part of our commissioning responsibilities.

The Practices are developing plans to ensure the extra patients generated from this proposed development and others in the area will have access to the necessary Primary Care Services in the growth area. The plans will be developed in conjunction with the CCG.

Planning for growth in general practice is complex; physical infrastructure is one element but alongside this workforce is a critical consideration both in terms of new workforce requirements and retirements. Any plans developed need to support delivery of sustainable services for the future

The population growth of 585 will require 48.8 m<sup>2</sup> based on NHS standard of 12 patients per square metre. At current build costs of £3,000 psm this equates to £146,400. A further 30% allowance for development fees means our request totals £190,320. The £3,000 psm is based on the average cost of a new surgery building in 2018/2019, so this figure should be indexed from 31 March 2019 in line with the General Building Cost Index.

In addition to the above we request that any agreement regarding a financial contribution:

- Allows the contribution to be used towards new general practice premises in the area serving this population (should GP Estates Strategy identify future requirement) and not just limited to the practice detailed above.
- Allows the contribution to be used towards professional fees associated with feasibility or development work for existing or new premises.
- Supports the proactive development of premises capacity with the trigger of any healthcare contribution being available linked to commencement or at an early stage of development.

The CCG is of the view that the above complies with the planning regulations and is necessary in order to mitigate the impacts of the proposal on the provision of general practice services

I would be grateful if you could advise me of the Council's decision in due course, should you require any further information, or points of clarification in the meantime please contact me using the above email address.

Yours sincerely

Charlotte Fairfax  
Primary Care Estates Officer  
East Kent CCGs