

East & North Herts CCG  
Charter House  
Parkway  
Welwyn Garden City  
Hertfordshire, AL8 6JL  
Mobile Telephone:

**By email:**

David Elmore  
Senior Development Management  
Officer  
Welwyn Hatfield Borough Council

26 May 2022

Dear David,

**Re: Planning Application Consultation: 6/2022/1097/OUTLINE**

**Proposal: Outline planning permission with all matters reserved except access, for up to 125 dwellings, a care facility for up to 60 bedrooms (Use Class C2), and a scout hut (Use Class F2).**

**Location: Land to the North of Bradmore Way, Bradmore Way, The Brookmans Estate, Brookmans Park.**

East & North Herts Clinical Commissioning Group has considered this planning application. Should this development of 125 dwellings and the care facility for up to 60 bedrooms go ahead, based on an average occupancy of 2.4 occupants per dwelling and 1 occupant per care facility bedroom, it will create circa 360 new patient registrations. This is noting that in terms of the 125 dwellings, if houses of 3 bedrooms or more, it will likely be more than 2.4 per dwelling.

Despite premises constraints GP Practices are not allowed to close their lists to new registrations without consultation with, and permission from, the East and North Herts Clinical Commissioning Group. We expect applications for closed lists to increase as new developments in the area go live. Even when surgeries are significantly constrained East and North Herts CCG and NHS England would not wish an individual patient to be denied access to their nearest GP surgery. It is therefore important that new housing contributes financially towards healthcare infrastructure. Patient lists are only closed in exceptional circumstances.

When new dwellings and registrations are planned the preferred option is to find a way to absorb those significant demands upon surgeries by providing additional resources, e.g. by re-configuring, extending or relocating the premises to provide sufficient space to increase resources and clinical services and thus keep the patient lists open. Developers' contributions under these circumstances is considered fair, reasonable and necessary.

Patients are at liberty to choose which GP practice to register with providing they live within the practice boundary and the CCG nor NHS England can prescribe which surgery patients should attend. However, the majority of patients choose to

register with the surgery closest and/or most easily accessible to their home for the following reasons; quickest journey, non-car dependent (public transport or walking distance), parking provision if a car journey is necessary, easy access during surgery hours, especially for families with young children and for older adults.

For several years, East and North Herts CCG, in accordance with national direction, has commissioned a number of additional services from general practice. This aspect of the general practice work is now due to increase substantially. Namely, the NHS Long Term Plan set out a requirement for practices to form Primary Care Networks (PCNs) effective from 1 July 2019. NHS England agreed an Enhanced Service to support the formation of PCNs, additional workforce and service delivery models for the ensuing 5 years.

In East and North Herts CCG there are 12 PCNs across the 6 localities; each covering a population of between circa 30,000 and 76,000 patients. These PCNs are expected to deliver services at scale for its registered population whilst working collaboratively with acute, community, voluntary and social care services in order to ensure an integrated approach to patient care. The PCN that covers Hatfield and under which this development falls has a combined patient registration list of 52,119 and growing.

For the above reasons a S.106 contribution is requested to make this scheme favourable to NHS England and East and North Herts Clinical Commissioning Group.

Please note that our calculations below are based purely on the impact of this development, based on the number of dwellings proposed and does not take into account other development proposals in the area.

**Below is the calculation of the contribution sought based on the number of dwellings proposed, for GMS GP provision:**

360 new patient registrations/2000 = 0.18 of a GP \*GP based on ratio of 2,000 patients per 1 GP and 199m<sup>2</sup> as set out in the NHS England "Premises Principles of Best Practice Part 1 Procurement & Development"

$0.18 \times 199 \text{ m}^2 = 35.82 \text{ m}^2$  of additional space required

$35.82 \text{ m}^2 \times \text{£}5,410^* \text{ per m}^2 = \text{£}193,786.20$  \* (\*Build cost; includes fit out and fees)

$\text{£}193,786.20 / 125 \text{ dwellings (to include the 60 care facility bedrooms for ease)} = \text{£}1,550.2896$  per dwelling (rounded down to £1,550 per dwelling)

**Total GMS monies requested: 125 dwellings x £1,550 = £193,750.00**

East and North Herts Clinical Commissioning Group propose to focus the GMS monies on Potterells Medical Centre directly opposite this development.

This may involve expansion, reconfiguration and digitisation of patient records. All of these and possibly other options are with a view to increasing clinical space and increasing the level of patient access in line with what will be needed.

To achieve this S106 monies are required as being ultimately the only source of funding. A trigger point of on occupancy of the 50<sup>th</sup> dwelling is requested. An advantage to an extension for example in reflecting on the operational impact of the pandemic is that in line with the direction of travel, areas need to be identified that can be isolated from the main practice area for obvious reasons.

NHS England and the East and North Herts Clinical Commissioning Group reserve the right to apply for S106 money retrospectively and the right to amend and request that this be reflected in any S106 agreement.

As well as the importance of a S.106 contribution for GMS, it is also vital to consider the impact of developments and additional residents on community and mental healthcare as occupiers of the development will access a variety of healthcare. Based on recent cost impact forecasting calculations, the potential cost impact of these developments going ahead on community and mental healthcare would be as follows:

**Mental Health costs:**

125 dwellings x £201.75 = £25,218.00

**Community Healthcare costs:**

125 dwellings x £182.03 = £22,753.00

Community Services for the Hatfield area under which this development falls are centralised from Queensway Health Centre in Hatfield Town Centre. The focus of the S106 would be on the continuing expansion and re configuration project that includes installation of a lift.

Mental Health Services for the Hatfield and Welwyn Garden City area under which this development falls are centralised at Roseanne House in Welwyn Garden City. The focus of the S106 would be on the evolving expansion and reconfiguration project on that site by taking on additional space with the building.

Both these projects rely on S106 funding being made available.

**Total mental health and community costs requested for the development= £47,971.00**

The CCG is keen to continue to work with Welwyn Hatfield Borough Council as well as the developer to ensure that patients access to healthcare isn't compromised by this development, or indeed, other developments.

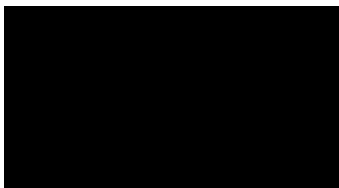
In terms of identifying a project in full at this stage the following points must be considered:

- All projects are subject to Full Business Case approval by the CCG and NHS England.
  - A commercial arrangement has to be agreed between the landowner, developer and end user based on a compliant design specification and demonstrate value for money.
- All planning applications and responses are in the public domain; identifying a project before any design work starts and funding is discussed, agreed and secured may raise public expectation and indicate a promise of improvements and increased capacity, which are subject to both above points. Securing developers contributions to all aspects of healthcare is vital.
- A project identified and costed in response to the planning application may not meet the objectives of the current strategies or could have significantly increased in cost, especially if there has been any significant time lapse from the date of the response to the date of implementation of the planning consent.

At the time of responding to planning applications it is unclear when the development may be delivered, even if the site is listed in the Local plan and features on the housing trajectory for the local authority or indeed if permission will be granted. But should this development, as with any other, materialise, it will have an impact on healthcare provision in the area and must be mitigated by legally securing developers contributions.

Subject to certainty that healthcare will form part of the development and/or developers contributions will be secured towards all aspects of healthcare East & North Herts Clinical Commissioning Group does not raise an objection to the proposed development.

Yours sincerely



Sue Fogden MRICS LLB (Hons)  
Assistant Director – Premises  
East & North Herts and Herts Valleys Clinical Commissioning Groups