

[REDACTED]

From: Finance (NHS COASTAL WEST SUSSEX CCG) [REDACTED]
Sent: 29 April 2019 14:53
To: Planning.Responses
Cc: Michael Eastham
Subject: RE: Planning Consultation on: EG/22/19/OUT

Hi Michael
Please find attached a response to EG/22/19/OUT

On the application it notes 28 homes in pen, but the total of section 15 notes 55 residential units.

I've based 28 on the wording, not the filled out section 15...

Hope that makes sense,

Simon

Simon Clavell-Bate
Head of Estates
Coastal West Sussex (CWS)
Clinical Commissioning Group (CCG)

Email: [REDACTED]
Mobile: [REDACTED]
Land Line: [REDACTED]
1 The Causeway, Goring-by-Sea, Worthing, West Sussex BN12 6BT
Web: www.coastalwestsussexccg.nhs.uk
Twitter: @cwscg

If you are seeking information under the Freedom of Information Act, please re-direct your request to CWS-foi@nhs.net

From: planning.responses@arun.gov.uk <planning.responses@arun.gov.uk>
Sent: 04 April 2019 11:37
To: Finance (NHS COASTAL WEST SUSSEX CCG) [REDACTED]
Subject: Planning Consultation on: EG/22/19/OUT

To: NHS Coastal West Sussex Coastal Commissioning Group

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)
Town & country Planning (Development Management Procedure) (England) Order 2015 -
Article 5 - Articles 16 & 18 Consultation before the grant of permission
Outline Consent

APPLICATION NO: EG/22/19/OUT

Registered: 1st April
2019

Site Address: Boweries Barnham Road Eastergate PO20 3RT

Grid Reference: 495055 105138

Description of Works: Outline application with some matters reserved for the erection of 28 No. dwellings, access, landscaping & associated works (resubmission following EG/42/18/OUT).

The Council have received the above application. I shall be pleased to receive any observations you may wish to make.

[Click here to view the application details](#)

Should you have any comments to make, these should be sent by replying to this email by 12-MAY-19.

You can also monitor the progress of this application through the Council web site:
www.arun.gov.uk/planning

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

The officer dealing with this application is Michael Eastham who can be contacted on telephone number 01903 737772.

Regards
Planning Officer

consultee_email

<http://www.arun.gov.uk>
DX 57406 Littlehampton
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Coastal West Sussex Clinical Commissioning Group

Simon Clavell-Bate

Head of Finance

CWS CCG

Monday 29th April 2019.

Arun District Council
West Sussex

Specific application note

(See Appendix 1) Development Contributions to Health Infrastructure through Section 106 / Community Infrastructure levy (CIL).

Application Number	EG/22/19/OUT
Date Registered	01/04/2019
Address of Proposed Site	Boweries Barnham Road Eastergate PO20 3RT
Grid Reference (if known)	495055 105138
Description of works:	Outline application with some matters reserved for the erection of 28 No. dwellings, access, landscaping & associated works (resubmission following EG/42/18/OUT).

Overview

Current Estate is at capacity in Arun. Growth is expected at circa 25% for new housing only.

Coastal West Sussex Clinical Commissioning Group (CWS CCG) is the lead organisation responsible for the health and wellbeing of more than 510,000 people

There are circa 165,000 residents in Arun, and a housing development plan (Arun's IDP) of increasing this by approximately 15,000 homes in the next 15 years - or 38,000 residents (**25% increase**).

Current GP primary care provision is delivered through an estate that has some purpose built structures and some that are developed from older housing style buildings.

Overall, infrastructure levels are below recommendations and there are pressures on all services. To this effect, there have been limited list 'capping' (restricting new registrations) as the problems affect all areas. There has been some expansion (estate wise) at the southern part of Littlehampton; at Park Surgery.

Development proposal

CWS CCG predicts that new residents will register **at Croft Surgery**, which is one of the primary care sites to support this proposed development. The facility at Croft surgery is being redeveloped (new build) and there is also planning under way for an integrated care centre adjacent to the current Arun Civic centre in Littlehampton.

Additional population generated by this development will place an increased demand on existing primary healthcare services to the area. The application did not include any provision for health infrastructure on site and so a contribution towards health infrastructure off-site via financial obligation is being sought.

The planning permission should not be granted Without an appropriate contribution to local health infrastructure to manage the additional load on services directly incurred as a consequence of this proposed development. **Without associated infrastructure, CWS CCG would be unable to sustain sufficient and safe services provided in the area and would therefore have to OBJECT to the development proposal.**

CWS CCG requests a contribution from the applicant of £38,139, as quantifiably in the tariff section, which will be used most likely towards the new build at Croft Surgery and the integrated services site, which will serve the catchment population of this proposed development. **The Tariff formula has been independently approved by the District Valuer**

Assessment & request

CWS CCG has undertaken an assessment of the implications of growth and the delivery of housing upon the health need of the District serving this proposed development, and in particular the major settlements in the district where new development is being directed towards. We have established that in order to maintain the current level of healthcare services, developer contributions towards the provision of capital infrastructure will be required. This information is disclosed to secure essential developer contributions and acknowledge as a fundamental requirement to the sound planning of the District.

The additional population generated by the development will inevitably place additional demand upon the existing level of health provision in the area. In the absence of developer contributions towards the provision of additional health infrastructure the additional strain placed on health resources would have a significant detrimental impact on District wide health provision.

Health utilises the legal advice outcomes and industry professional inputs from other public funded area, such as the Police service. With the direct impact of new housing and house growth plans on registered patients, the submission that follows captures the necessary, directly related and fair/reasonable contributions required that relate to the associated house build volumes. The tried and tested formula used has been in use for many years and is annually reviewed.

Current Primary Healthcare Provision in Arun

Primary Care services in Arun are provided by 15 GP practices, funded from NHS funds for providing Primary health care.

Some sites are purpose built in prior decades, or are run from converted houses (as per the original NHS start point for General Practice).

Patient demand is high in the Arun area and the proportion of patients over the age of 65 was high, at 27% (England 17.7%). Arun has a higher demand elderly population, which means that the estate need will be on the upper end of 'requirement/recommended' values.

The current estate for Arun is of an older nature and is more than 25% below expected size requirements for the population size. The impact of an aging population (Arun at 27% and England average of 17.7% ONS data), cramped premises, short supply of any medical/nursing staff and increase in demand for GP services puts a very high strain on GP resources.

The effect of this has already been found in Arun with a GP service having closed in 2016 and the patients having to re-register and be cared for by other GP practices – in their current buildings. There has been added infrastructure at Park Surgery, to the south of Littlehampton area.

The proposed development will need to have Primary Care infrastructure in place in order to care for the population increase. This contribution requested will be for the necessary infrastructure to cater for the site development at the most local GP service site(s) and encompass all the necessary components of patient need, whether at the GP practice or neighbouring service area.

Contribution Sought and Methodology

The funding will be a contribution to £38,139 for the infrastructure needs of managing “**Patient Area**” at Croft (preferred option) to be delivered by Croft Surgery development and working with new facilities at the planned Integrated centre in Arun.

A copy of the Developer application is at Appendix 1 – the main note

CWS CCG, in line with NHS services and CCGs across England, uses a service-demand and build-cost model to estimate the likely demand of increasing populations on healthcare provision and the cost of increasing physical capacity to meet this demand.

This service-demand and build-cost model is ideal for estimating the likely impact of future residents arising from a new development on health infrastructure capacity and the cost implications this will have on the CCG, through the need to build additional physical capacity (in the form of new/expanded GP surgeries). The model has been used by CCGs in the southeast for over 10 years and is accepted by local planning authorities across West Sussex.

Service-load data is calculated on a square-metre-per-patient basis at a factor of 0.1142sqm/person. This factor is based on the average size of typical GP practices ranging from 1 to 7 doctors, assuming 1600 patients per doctor.

Build-cost data has been **verified by the District Valuer Service** (last update May 2018) and assumes £4,400/sqm, ‘sense-checked’ against two recent building projects undertaken by the CCG. The cost inputs refers only to capital construction costs; the CCG intends to fund the revenue cost of running the GP practices in perpetuity including staffing costs, operational costs and medical records etc.

Occupancy data, used to calculate the number of future patients-per-dwelling, is derived from 2011 Census Data and confirmed by West Sussex County Council (last update July 2015).

Finally, the specific dwelling size and mix profile for the proposed development is input into the model to provide a bespoke and proportionate assessment of the likely impact on health infrastructure arising from the development.

The output of this model for the proposed development is an estimated population increase of 76 new residents with a consequential additional GP surgery area requirement of 8.67m². This equates to a direct cost of **£38,139** for additional health infrastructure capacity arising from the development. The council is requested to ensure this contribution is index-linked within the S106 agreement at a basis that meets house build cost growth.

The Health Tariff is on the next page

Health Tariff

S106 Contribution to NHS/GP Community/Specialist Service (Formula agreed by The District Valuer)							
Arun DC reference EG/22/19/OUT							
28 Dwellings at Eastergate							
Font in red can be adjusted							
						 Coastal West Sussex Clinical Commissioning Group	
Housing Development							
House Numbers (Inc Social Housing)	House Type	New Occupanc (Persons)	Surgery Area Requirement (sqm)		Infrastructure Development cost(psm)	Capital Contribution (£)	Approx Contribution per dwelling(£)
	1 Beds	0	0	@	£4,400	£0	
1	2 Beds	2	0	@	"	£955	£955
14	3 Beds	35	4	@	"	£17,587	£1,256
13	4 Beds	39	4	@	"	£19,597	£1,507
	5 Beds	0	0	@	"		
	Care Home						
28	House Total	76	8.67	@	"	£38,139	
Ave Occupancy		2.71	Contribution Per Dwelling			£1,362	per dwelling
						£502	per person
Occupancy Assumptions (confirmed by WSCC JUL 2015)					Care home contributions are at up to 100% of 1 bed dwelling		
PER CENSUS 2011 - WSCC							
Infrastructure costs	£4,400.0	psm					
Average Sqm Per Patient	0.1142	sqm					
Average Occupancy Assumptions							
	1 Bed	1.0	Persons				
	2 Bed	1.0	Persons				
	3 Bed	2.0	Persons				
	4 Bed	3	Persons				
	5 Bed	3	Persons				
Explanation							
1. Build costs include basic build cost, finance, professional fees. To be amended annually.							
2. The occupancy assumptions can be amended as per the requirements of the Local Authority.							
3. The average sq metre per patient has been derived from SFA 2003/04 as below, including additional space. This can be amended to reflect the flexibility of the NHS Directions and the requirement of the CCG to provide addition clinical or service development space within a new development							
1600 patients per GP							
1500	sqm GIA	7	GP Practice	AVG Patient List	11200	0.1339	sq m per patient
836	sqm GIA	6	GP Practice	AVG Patient List	9600	0.0871	sq m per patient
718	sqm GIA	5	GP Practice	AVG Patient List	8000	0.0898	sq m per patient
646	sqm GIA	4	GP Practice	AVG Patient List	6400	0.1009	sq m per patient
487	sqm GIA	3	GP Practice	AVG Patient List	4800	0.1015	sq m per patient
374	sqm GIA	2	GP Practice	AVG Patient List	3200	0.1169	sq m per patient
271	sqm GIA	1	GP Practice	AVG Patient List	1600	0.1694	sq m per patient
Average						0.1142	sq m per patient

Compliance with National Policy and CIL regulations

The Community Infrastructure Levy Regulations in 2010 imposed new legal tests on local planning authorities to control the use of planning obligations (including financial contributions) namely through Section 106 agreements as part of the granting of planning permission for development.

The three legal tests were laid down in Community Infrastructure Levy Regulation 122: “A *planning obligation may only constitute a reason for granting planning permission for the development if the obligation is:*

i. Necessary to make the proposed development acceptable in planning terms

Health infrastructure is an important material planning consideration in the determination of planning applications and the Council must take into account the positive or negative impact of development proposals on health infrastructure when granting planning permission and associated section 106 agreements. There is no dedicated Government funding to cover new housing developments. Unless contributions from developments are secured, at worst there will be practices that would be forced to close as there would not be safe healthcare provision. In the least, there will be wait times (mainly driven by no estate / rooms to see patients in) would not be suitable for adequate healthcare.

Arun DCs local plan has increasing incremental annual growth assumptions for housing development with certain strategic sites are potentially going to deliver in excess of 1,000 homes per year coupled with non-strategic housing developments such as this.

The pace of delivery and volume of new build housing and its subsequent occupancy will have a negative impact on the availability and capacity of health infrastructure causing a strain on existing services; the required additional infrastructure will comprise: clinical rooms for consultation/examination and treatment and medical professionals (and associated support service costs and staff).

The plan is therefore to utilise any GP estate that can be ‘extended’ or built on in the shorter term. In the medium term, where existing site constraints and/or building condition restrict further development CWS CCG seeks to include these necessary and additional works as part of a new integrated community hub facilities at a new site which will serve the catchment population of this proposed development, which may include the provision of new GP estate to be built on strategic sites as per the Arun DC local plan (2011-2031).

ii. Directly related

It is indisputable that the increase in population of approximately 76 people living in the new development at The Croft will place direct pressure on all organisations providing healthcare in the locality, in particular primary care provided by the Clinical Commissioning Group. **Put simply, without the development taking place and the subsequent population growth there would be no requirement for the additional infrastructure.**

The proposed developer contribution is therefore required to enable a proportionate increase to existing health infrastructure, to maintain its current level of service in the area.

The infrastructure highlighted and costed is specifically related to the scale of development proposed. This has been tried and tested and has District Valuer support, in terms of the value of contribution.

iii. Fair and reasonably related in scale and kind to the proposed development

The developer contribution is to help achieve a proportionate increase in health infrastructure, thus enabling health to maintain its current level of service. Utilising a housing size as a reasonable proportion of infrastructure scale allows for fairness to all new housing developments, including the sites that are also strategic in nature.

The model uses robust evidence including local census data, build cost estimates verified by the District Valuer Service and population projections verified by West Sussex County Council. A review of the police CIL compliance and their review of education and library compliance underlie the fair and reasonable approach of the health tariff – which is in turn in line with the other public sector areas.

Conclusion

In summary, the contributions sought by the Clinical Commissioning Group are well evidenced, founded in adopted development plan policy and comply with the legal tests of the CIL Regulations and NPPF. The contribution will be used to provide additional capacity in primary care facilities in the vicinity of the development, directly linked to this development, to support its future residents. To reiterate, without this essential contribution, planning permission should not be granted.

Thank you for the continued support in securing health infrastructure contributions to enable the population of Arun to have access to the health care that it needs now and for future generations

Yours sincerely,

A black rectangular box redacting the signature of Simon Clavell-Bate.

Simon Clavell-Bate
B.Ed Hons, FCCA
Head of Estates
Coastal West Sussex Clinical Commissioning Group

Appendix 1
AL/32/19/OUT – Developer application



EG/22/19/OUT

Arun Civic Centre
Maitravers Road
Littlehampton
West Sussex BN17 5LF
Tel: 01903 737758

www.arun.gov.uk

Application for Outline Planning Permission With Some Matters Reserved.
Town and Country Planning Act 1990

Publication of applications on planning authority websites.

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

1. Site Address

Number	
Suffix	
Property name	Roweries
Address line 1	Barnham Road
Address line 2	
Address line 3	
Town/city	Eastergate
Postcode	PO20 3RT
Description of site location must be completed if postcode is not known.	
Easting (x)	496086
Northing (y)	105138

Outline application with
some matters reserved for the
decision of 28 No. dwellings,
access, landscaping &
associated works (resubmission
following EG/42/18/OUT).

Description

2. Applicant Details

Title	
First name	
Surname	
Company name	Domusea Developments Ltd
Address line 1	Job Agent
Address line 2	
Address line 3	
Town/city	
Country	

13. Biodiversity and Geological Conservation

- ☐ Yes, on the development site
☐ Yes, on land adjacent to or near the proposed development
☒ No

14. Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste? ☐ Yes ☒ No

Have arrangements been made for the separate storage and collection of recyclable waste? ☐ Yes ☒ No

15. Residential/Dwelling Units

Due to changes in the information requirements for this question that are not currently available on the system, if you need to supply details of Residential/Dwelling Units for your application please follow these steps:

1. Answer 'No' to the question below;
2. Download and complete this supplementary information template (PDF);
3. Upload it as a supporting document on this application, using the 'Supplementary information template' document type.

This will provide the local authority with the required information to validate and determine your application.

Does your proposal include the gain, loss or change of use of residential units? ☒ Yes ☐ No

Please select the proposed housing categories that are relevant to your proposal.

- ☒ Market
☒ Social
☒ Intermediate
☐ Key Worker

Add 'Market' residential units:

Market: Proposed Housing						
	Number of bedrooms					
	1	2	3	4+	Unknown	Total
Houses	0	0	7	13	0	20
Total	0	0	7	13	0	20

Add 'Social' residential units:

Social: Proposed Housing						
	Number of bedrooms					
	1	2	3	4+	Unknown	Total
Houses	0	1	5	0	0	6
Total	0	1	5	0	0	6

Add 'Intermediate' residential units:

Intermediate: Proposed Housing						
	Number of bedrooms					
	1	2	3	4+	Unknown	Total
Houses	0	0	2	0	0	2
Total	0	0	2	0	0	2

15. Residential/Dwelling Units

Social: Proposed Housing						
	Number of bedrooms					
	1	2	3	4+	Unknown	Total
Unknown	0	0	0	0	13	13
Total	0	0	0	0	13	13

% of 'Intermediate' residential units

Intermediate: Proposed Housing						
	Number of bedrooms					
	1	2	3	4+	Unknown	Total
Houses	0	0	0	0	5	5
Total	0	0	0	0	5	5

Please select the existing housing categories that are relevant to your proposal.

- ☐ Market
☐ Social
☒ Intermediate
☐ Key Worker

Total proposed residential units

65

Total existing residential units

0

16. All Types of Development: Non-Residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace?

☒ Yes ☐ No

17. Employment

Will the proposed development require the employment of any staff?

☐ Yes ☒ No

18. Hours of Opening

Are Hours of Opening relevant to this proposal?

☐ Yes ☒ No

19. Industrial or Commercial Processes and Machinery

Please describe the activities and processes which would be carried out on the site and the end products including plant, ventilation or air conditioning. Please include the type of machinery which may be installed on site.

None

Is the proposal for a waste management development?

☐ Yes ☒ No

If this is a landfill application you will need to provide further information before your application can be determined. Your waste planning authority should make it clear what information it requires on its website.