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

By email:

Peter Bull DipTP MRTPI
Project Officer
Major Projects Team
North Herts District Council

Dear Peter,

Re. Planning Application Consultation: 24/01604/FP - Temple Dinsley (formerly The Princess Helena College) School Lane Preston Hertfordshire SG4 7RT

Proposal: Change of use of the Former Princess Helena College and associated land from a former all-girls boarding school to 69no. private residential dwellings (Use Class C3), including the conversion of the main Grade II* Listed House to 35no. new apartments, the conversion of the retained Teaching Block to provide 8 new apartments, the demolition of the existing sports hall building and science block and replacement with 20no. new houses and 2no. new apartments, the conversion of the Tank House and the Pump House buildings to provide 2no. detached dwellings and the erection of 2no. new dwellings located within the summerhouse plantation. The provision of a new car-park together with domestic storage units and covered parking bays to include solar PV Panels, and waste storage units and the provision of new driveways and associated works. Erection of new sub-station building and plant room. In addition, the associated landscaping of the site including provision of new pathways and gates and the reinstatement of Grade II* Listed Parks and Gardens and the provision of a new Cricket Pitch and associated Cricket Pavilion.

Thank you for consulting the Hertfordshire and West Essex Integrated Care Board (HWE ICB) on the above-mentioned planning application.

The HWE ICB became a statutory body on 1 July 2022 and is the health commissioner responsible for delivering joined up health and social health care to a population of c1.8m. in Hertfordshire and west Essex.

Dr Jane Halpin, Chief Executive

Rt. Hon. Paul Burstow, Chair

The HWE ICB works in partnership with health providers, local authorities, and other organisations to:

- improve the general health and wellbeing of Hertfordshire and west Essex residents and improve health care services in the area.
- tackle the inequalities which affect people's physical and mental health, such as their ability to get the health services they need, and the quality of those services help tackle health and wider inequalities.
- get the most out of local health and care services and make sure that they are good value for money.
- help the NHS support social and economic development in Hertfordshire and west Essex.

Assessment of impact on existing Healthcare Provision

The HWE ICB has assessed the impact of the proposed development on existing primary health care provision in the vicinity of the development and working on the basis of an average of 1.7 occupants per dwelling across the development housing mix = 69 dwellings x 1.7 occupants = circa **117.3 new patient registrations.**

Market Housing

Please specify each type of housing and number of units proposed

Housing Type:						
Houses						
1 Bedroom:	0					
2 Bedroom:	2					
3 Bedroom:	14					
4+ Bedroom:	8					
Unknown Bedroom:	0					
Total:	24					
Housing Type:						
Flats / Maisonettes						
1 Bedroom:	12					
2 Bedroom:	25					
3 Bedroom:	7					
4+ Bedroom:	1					
Unknown Bedroom:	0					
Total:	45					
Proposed Market Housing	1 Bedroom Total	2 Bedroom Total	3 Bedroom Total	4+ Bedroom Total	Unknown Bedroom Total	Total
Category Totals	12	27	21	9	0	69

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Within the HWE ICB there are 35 Primary Care Networks (PCNs) across the 14 localities; each covering a population of between circa 27,000 and 68,000 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. As such a doctors' general practitioners' surgery may include an ancillary pharmacy and ancillary facilities for treatments provided by general practitioners, nurses and other healthcare professionals. Hitchin and Whitwell PCN, under which this development directly falls, has a combined patient registration **list of 47,704** which is growing.

Patients are at liberty to choose which GP practice to register with providing they live within the practice boundary. However, the majority of patients choose to register with the surgery closest and/or most easily accessible to their home for the following reasons: it is the quickest journey, accessible by public transport or is in walking distance), parking provision, especially for families with young children and for older adults.

Despite premises constraints GP Practices are not allowed to close their lists to new registrations without consultation with, and permission from the HWE ICB. Even when surgeries are significantly constrained the NHS will seek to avoid a situation where a patient is denied access to their nearest GP surgery, with patient lists only closed in exceptional circumstances.

As a result of significant growth proposed in Local Plans, the HWE ICB expects applications to close lists to increase. It is therefore important that new developments make a financial contribution to mitigate any primary health care impacts the development will have.

Healthcare Needs Arising from the Proposed Development

This development will have an impact on primary health care provision in the Preston area and its implications, if unmitigated, would be unsustainable for the NHS.

The financial contribution for health infrastructure that the HWE ICB is seeking, to mitigate the primary health care impacts from this development, has been calculated using a formula based on the number of units proposed and does not take into account any existing deficiencies or shortfalls in the Preston area and its vicinity, or any other development proposals in the area.

Cost calculation of additional primary healthcare services arising from the development proposal

$117.3 / 2000 = 0.05865$ of a GP *GP based on ratio of 2,000 patients per 1 GP and 199m² as set out in the NHS England "Premises Principles of Best Practice Part 1 Procurement & Development"

$0.05865 \times 199 \text{ m}^2 = 11.67135 \text{ m}^2$ of additional space required

$11.67135 \text{ m}^2 \times £7,000^* \text{ per m}^2 = £81,699.45$ (*Build cost; includes fit out and fees)

$£81,699.45 / 69 \text{ dwellings} = £1,184.05 \text{ per dwelling}$ (rounded down to £1,184 per dwelling)

Total GMS monies requested: 69 dwellings x £1,184 = £81,696.00

The HWE ICB therefore requests that this sum is secured through a planning obligation attached to any grant of planning permission, in the form of a Section 106 planning obligation. A trigger point of payment on occupancy of the 5th Dwelling is requested.

If planning permission is granted, the HWE ICB propose to focus Section 106 monies on Whitwell Surgery and Portmill and Regal Chambers Surgeries in Hitchin by way of expansion of the capacity of the existing premises which is forecast to include:

- Whitwell - reconfiguration building work on the ground floor to create dedicated clinical rooms which will have to include IT cabling and hardware. Conversion of a sizeable attic space such as for Additional Roles staff or other clinical staff to use allowing more face to face appointments in the clinical rooms on the ground floor.
- Portmill Surgery – reconfiguration building work of an existing room and some of a waiting area to create additional clinical room capacity which will have to include IT cabling and hardware.
- Regal Chambers - reconfiguration building work to close in a waiting area and transform it into a clinical room which will have to include IT cabling and hardware,

These are all in the pipeline to enable increase of capacity and patient access to provide sufficient space to increase resources and clinical services and thus keep the patient lists open.

Please note, the developer contribution figures referred to in this response is a calculation only and that the final payment will be based on the actual dwelling unit mix and the inclusion of indexation.

In terms of identifying full projects at this stage please note:

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- All projects are subject to Full Business Case approval by the HWE ICB and NHS England.
- Any commercial arrangement has to be agreed between the landowner, developer and end user based on a compliant design specification and which demonstrates 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 the above points. Securing developers contributions to all aspects of healthcare is therefore vital.
- A project identified and costed in response to the planning application may not meet the objectives of 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.

In conclusion, in its capacity as the primary healthcare commissioner with full delegation from NHS England, the HWE ICB has identified a need for additional primary healthcare provision to mitigate the impacts arising from the proposed development. The cost calculation, set out above are those that the HWE ICB and NHS England deem appropriate having regard to the formulated needs arising from the development.

The HWE ICB is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations, as set out in the NPPF. Further, NHS England and the HWE ICB reserve the right to apply for S106 money retrospectively and the right to amend and request that this be reflected in any S106 agreement.

Subject to certainty that developer contributions are secured, as set out above, the HWE ICB does not raise an objection to the proposed development.

The HWE ICB looks forward to working with the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of receipt of this letter.

Yours sincerely,



Sue Fogden MRICS LLB (Hons)

Dr Jane Halpin, Chief Executive

Rt. Hon. Paul Burstow, Chair

Director – Estates and Capital

NHS Hertfordshire & West Essex ICB

Dr Jane Halpin, Chief Executive

Rt. Hon. Paul Burstow, Chair

