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

By email:

Dominic Bateman  
Development Management  
St Albans City & District Council

Dear Dominic,

**Re: Planning Application Consultation: 5/2022/2443**

**Proposal: Demolition of existing buildings and construction of up to 115 dwellings and creation of new access**

**Location: Bricket Wood Sports And Country Club, Paintball Site & Bricket Lodge Lye Lane Bricket Wood Hertfordshire AL2 3TF**

NHS Hertfordshire & West Essex ICB has considered this planning application. Should this development of 115 dwellings go ahead, based on an average occupancy of 2.4 occupants per dwelling, it will create circa 276 new patient registrations.

Despite premises constraints GP Practices are not allowed to close their lists to new registrations without consultation with, and permission from, the NHS Hertfordshire & West Essex ICB. We expect applications for closed lists to increase as new developments in the area go live. Even when surgeries are significantly constrained NHS Hertfordshire & West Essex ICB 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

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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 ICB 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, NHS Hertfordshire & West Essex ICB, 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 NHS Hertfordshire & West Essex ICB there are 35 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. The PCN that covers St Albans and under which this development falls has a combined patient registration list of 141,130 and growing.

For the above reasons a S.106 contribution is requested to make this scheme favourable to NHS England and NHS Hertfordshire & West Essex ICB.

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:**

276 new patient registrations/2000 = 0.138 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"

$0.138 \times 199 \text{ m}^2 = 27.462 \text{ m}^2$  of additional space required

$27.462 \text{ m}^2 \times \text{£}5,410^* \text{ per m}^2 = \text{£}148,569.42$  (\*Build cost; includes fit out and fees)  
 $\text{£}148,569.42 / 115 \text{ dwellings} = \text{£}1,291.908$  per dwelling (rounded up to £1,292 per dwelling)

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**Total GMS monies requested: 115 dwellings x £1,292.00 = £148,580.00**

NHS Hertfordshire & West Essex ICB propose to focus the GMS monies on Bricket Wood Medical Practice or Park Street Surgery.

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 1st dwelling & 50th 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 NHS Hertfordshire & West Essex 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.

The ICB is keen to continue to work with St Albans City & District 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 ICB 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 be the beneficiary of the aforementioned Section 106 contributions in relation to this development. NHS Hertfordshire & West Essex ICB does not raise an objection to the proposed development.

Yours sincerely

Sue Fogden MRICS LLB (Hons)



Assistant Director – Premises

NHS Hertfordshire & West Essex ICB

