



Mid Devon District Council
Planning and Building Control
Phoenix House
Phoenix Lane
Tiverton
Devon
EX16 6PP
[REDACTED]

NHS Devon LPA Engagement
Commercial Development Team
1st Floor Estates and Facilities
Torbay Hospital
Lowes Bridge
TQ2 7AA
[REDACTED]

Date: 2nd September 2021

Dear Sir/Madam,

With reference to:

Planning Application Ref: 21/01576/MOUT

Applicant Name: Waddeton Park Ltd

Description: Outline for the extension of existing business park for up to 3.9ha of employment land and up to 150 dwellings with associated infrastructure and access with all other matters reserved

Address: Land at NGR 298976 112882 (Hartnoll Farm) Tiverton Devon

The application has been reviewed from a primary care perspective and the following comments are provided by NHS Devon Clinical Commissioning Group as their response to the application. The response has been informed by the Devon Health Contributions Approach: GP Provision (<https://www.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance>) which was jointly prepared by NHS England and Devon County Council.

In preparing this response, it is noted that the documents of the Mid Devon Local Plan 2013 – 2033 (adopted July 2020) states that:

“Vision and Spatial Strategy

Vision

1.15...

Promote community well-being



- *Diverse, inclusive communities with a vibrant mix of accessible uses and local services*

Spatial Strategy

Other Market Towns

The market towns of Tiverton and Crediton will be the secondary focuses of new development, in scale with their individual infrastructures, economies, characters and constraints.

Development will be targeted to:

- *Provide a sustainable mix of fit for purpose homes, businesses, shops, leisure, health, education and many other uses, to resolve existing problems where feasible and to meet rural needs*

Infrastructure

Policy S8

Infrastructure

The location, scale and form of development will be guided by the need for community facilities and any existing infrastructure deficiencies. The Council will work with providers and developers to ensure that new development is served by necessary infrastructure in a predictable, timely and effective fashion. Development and transport planning will be coordinated to improve accessibility for the whole community and promote the use of sustainable modes of transport. The Council will set out key infrastructure and facility requirements for new development in an Infrastructure Plan, taking account of existing provision and cumulative impact of new development. Developers will be expected to contribute fairly towards, or bear the full cost of, new or improved infrastructure and facilities where it is appropriate for them to do so, subject to viability assessment where appropriate.

Planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be subject to satisfactory mitigation having regard to the latest infrastructure plan.

Policy TIV15

Strategic Local Plan sites will be required to pay for specific items of infrastructure that are necessary to make the development acceptable.

The Council's strategic infrastructure policy is set out earlier in the Local Plan under Policy S8, but there are infrastructure requirements specific to Tiverton that are listed under Policy TIV15. The Council will use CIL, planning obligations for strategic sites and other sources of funding to deliver the infrastructure listed wherever possible. The Council's Regulation 123 list and accompanying policy on the use of Section 106 agreements, sets out the mechanism to be used to fund infrastructure. Where another organisation is



responsible for delivering the infrastructure required as a result of new development, the Council will work in partnership with the relevant bodies to ensure that infrastructure needs associated with development are addressed appropriately.”

The CCG’s concern is that the combined surgeries of Amicus House, Castle Place Practice, Sampford Peverell Surgery and Willand Surgery are already over capacity within their existing footprints therefore it follows that to have a sustainable development in human health terms the whole local healthcare provision will require review. The combined surgeries already have 30,195 patients registered and this new development will increase the local population by a further 350 persons.

Taking this into account and drawing upon the document “*Devon Health Contributions Approach: GP Provision document*” which was agreed by NHS England and Devon County Council, the following calculation has been made:

Methodology for Application 21/01576/MOUT

1. Residential development of 150 dwellings
2. This development is in the catchment of Amicus House, Castle Place Practice, Sampford Peverell Surgery and Willand Surgery which has a total capacity for 28,322 patients.
3. The current patient list size is 30,195 which is already over capacity by 1,873 patients which equates to 107% of capacity.
4. The increased population from this development = 350
 - a. No of dwellings x Average occupancy rate = population increase
 - b. $150 \times 2.33 = 350$
5. The new GP List size will be 30,545 which is over capacity by 2,223
 - a. Current GP patient list + Population increase = Expected patient list size
 - b. $30,195 + 350 = 30,545$ (2,223 over capacity)
 - c. *If expected patient list size is within the existing capacity, a contribution is not required, otherwise continue to step 6*
6. Additional space required = 26.21m²
 - a. The expected m² per patient, for this size practice = 0.075m²
 - b. Population increase x space requirement per patient = total space (m²) required
 - c. $350 \times 0.075 = 26.21m^2$
7. Total contribution required = **£83,880**
 - a. Total space (m²) required x premises cost = final contribution calculation
 - b. $26.21m^2 \times £3,200 = £83,880$ (£559 per dwelling).

Could you please acknowledge the CCG's request for an S106 contribution towards the cost mitigation of the pressures on the local healthcare facility and that it will form part of any future s106 Agreement with the Developers.

Yours faithfully,

A solid black rectangular box redacting the signature of George Grute.

George Grute

Commercial Development Manager

On behalf of:

NHS Devon Clinical Commissioning Group (CCG)

