

Dear Ms Dyson,

Please find attached documents on behalf of NHS Devon Clinical Commissioning Group (CCG) relating to the above appeal.

If you have any queries then please do not hesitate to contact me.

Regards

 #hello my name is...

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*Working with you, for you*



**Devon**  
**Clinical Commissioning Group**

**Alison Dyson**

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28<sup>th</sup> February 2020

Dear Ms Dyson,

**Appeal Reference:** APP/X1165/W/20/3245011

**Reference to:** P/2017/1133, Land To The South Of White Rock, Adjacent To Brixham Road (AKA Inglewood), Paignton

On behalf of the NHS Devon Clinical Commission Group (The NHS Devon CCG) we would like to bring to your attention that due consideration pertaining to the potential Health impacts for this planning application were not appropriately undertaken.

**Impact**

Compass House Medical Centre operates a GP branch Surgery which is located on Langdon Lane in Galmpton, which is adjacent to the open fields where the "Inglewood" planning application P/2017/1133 for 373 dwellings is proposed. This would mean an additional approximately 800 new residents all of whom will require GP services. The majority of these will seek to join the Galmpton branch surgery which already has limited space and would not be able to cope with these additional patients.

General concerns regarding the ability and capacity of all GP practices across Devon had been raised at a Primary Care Estates Planning Session that was undertaken by the CCG and was attended by Andrew Gunther who is the Senior Strategic Planner at Torbay Council, therefore the potential impacts on local health services were known to the local planning authority as well as other authorities across the County of Devon. The 'Devon Health Contributions Approach: GP Provision' (<https://www.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance>) document provides a consistent methodology for calculating the current capacity of a GP practice as well as the potential cost to mitigate

any expansion or development of a new surgery if required to support new housing developments.

The Torbay Council Adopted local plan – Torbay Local Plan 2012-2030: Policy SC1 Healthy Bay states that:

*All development should contribute to improving the health and well-being of the community, reducing health inequalities and helping to deliver healthy lifestyles and sustainable neighbourhoods proportionate to the scale of the proposal.*

*To achieve these requirements, applicants should demonstrate that they have had regard to the following:*

- 1. Consideration of the opportunities available to address the cause of ill-health in the local area;*
- 2. Promotion of healthy, safe and active living for all age groups, including healthy living, options for older people; and*
- 3. Improvement of access to medical treatment services, including the provision of healthcare clusters where appropriate,*

*Major residential developments of 30 or more dwellings or other development creating over 1,000 square metres of floorspace will be required to undertake a screening for Health Impact Assessment (HIA), and a full HIA if necessary, proportionate to the development proposed, to demonstrate how they maximise positive impacts on health and healthy living within the development and in adjoining areas. This will also apply to smaller-scale developments where there are reasons to indicate that a proposal may give rise to a significant impact on health.*

It would appear that despite the size of this development a Rapid HIA was undertaken to assess the Health Impacts which stated:

*In preparing this Rapid HIA, regard has been had to a range of material, including those listed below. Advice has also been sought from Council Officers via the submission of an initial HIA Screening Assessment which, with advice, has been revised to form this Rapid HIA.*

It also rated the 'No onsite provision of adult/social care services' and concluded:

*Not providing onsite means that there will be an inevitable reliance on existing service provision on which there may be increased demand. It is however considered that external parties, including the CCG, will be responsible for ensuring appropriate levels of service/provision are maintained.*

It would appear that neither the CCG or the GP practice was consulted and therefore were not given the opportunity to consider the direct impact that this development will create on the GP services.

In fact, as this development was validated in November 2017 then the Town and country Planning (Environmental Impact Regulations) 2017 will apply (in particular Regulations 4(2) (a) which requires consideration to be given population and human health and 18 (5) which requires the statement is prepared by a competent expert. We believe that an appropriate assessment has not been carried out in accordance with the Regulations and additionally no assessment has been undertaken to calculate both the individual and cumulative impacts that the development will have on population and human health and specifically access to local health services.

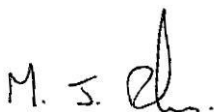
The impact will create a significant direct effect on the existing and the new population ability to access health services whereby acceptable and safe care will be compromised. Currently the patients within the Galmpton area often have to accept an appointment at the Brixham Surgery which is up to 4 miles further to travel, or decide to wait longer in order to be seen at the Galmpton Surgery. This development will increase the Galmpton population and therefore exacerbate this problem and will have a direct impact on both the new residents as well as the current local population. These additional, but potentially avoidable journeys will also have a direct environmental impact.

Furthermore, the healthcare demand in the local area is increasing at a faster rate than the ONS Population forecasts. For the Torbay and South Devon area the average annual population increase is 0.52% (2014 and 2020), however the GP surgery has been experiencing 5% year on year growth in its patient list size.

Torbay and South Devon (CCG)		
Year	SNPP Forecast	% Increase
2014	277,032	
2015	278,160	0.41%
2016	279,526	0.49%
2017	280,988	0.52%
2018	282,536	0.55%
2019	284,101	0.55%
2020	285,772	0.59%

We therefore request that as a direct result of the DCC formula (see Appendix A) that £148,867 is requested in order to fund the additional consulting and clinic rooms at the Galmpton surgery to mitigate at least the immediate impact that this development will create on the local GP surgery.

Yours sincerely,



Malcolm Dicken  
Head of Commercial Development

On behalf of NHS Devon CCG

**Appendix A – Devon County Council Impact Formula for Galmpton Surgery**

Application Number	P/2017/1133				
Local Authority	Torbay Council				
	<b>Combined</b>	<b>Compass House Galmpton</b>	<b>Compass House Brixham</b>	<b>Practice 3 N/A</b>	<b>Practice 4 N/A</b>
Distance to Site (miles)		1	4.4	0	0
P/2017/1133 No of Dwellings	373	373	373	0	0
[Application Number] No of Dwellings	0	0	0	0	0
Combined Dwellings	<b>373</b>	<b>373</b>	<b>373</b>	<b>0</b>	<b>0</b>
Occupancy Rate	2.17	2.17	2.17	2.17	2.17
Combined Population Increase	<b>809</b>	<b>809</b>	<b>809</b>	<b>0</b>	<b>0</b>
<b>Pre Development Impact</b>					
Current No of Patients	12752	3188	9564	0	0
Patient Capacity	11931	2550	9381	#N/A	#N/A
Under/Over Capacity	<b>821</b>	<b>638</b>	<b>182.875</b>	#N/A	#N/A
% Under/Over Capacity	<b>107%</b>	<b>125%</b>	<b>102%</b>	#N/A	#N/A
<b>Post Development Impact</b>					
Expected List size	13561	3997	10373	0	0
Under/Over Capacity	<b>1630</b>	<b>1447</b>	<b>992</b>	#N/A	#N/A
% Under/Over Capacity	<b>114%</b>	<b>157%</b>	<b>111%</b>	#N/A	#N/A
Space Requirement	0.080	0.080	0.080	#N/A	#N/A
a) Actual GIA m2	954.49	204.00	750.49	0.00	0.00
b) Current Patient List m2	<b>1020.16</b>	<b>255.04</b>	<b>765.12</b>	#N/A	#N/A
c) New Patient List m2	<b>1019.24</b>	<b>268.75</b>	<b>815.24</b>	#N/A	#N/A
d) Over/Under Capacity m2	<b>64.75</b>	<b>64.75</b>	<b>64.75</b>	#N/A	#N/A
New Space Required (m2)	<b>64.75</b>	<b>64.75</b>	<b>64.75</b>	#N/A	#N/A
Premises Cost	£ 2,299	£ 2,299	£ 2,299	£ 2,299	£ 2,299
Cost of new space	<b>£ 148,867</b>	<b>£ 148,867</b>	<b>£ 148,867</b>	#N/A	#N/A
Cost per dwelling	<b>£ 399</b>	<b>£ 399</b>	<b>£ 399</b>	#N/A	#N/A