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Planning Department
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NHS Devon LPA Engageent
Commercial Development Team
1st Floor Estates and Facilities
Torbay Hospital
Lowes Bridge
TQ2 7AA
tsdft.lpae-devon@nhs.net

Date: 21st September 2022

Dear Sir/Madam,

With reference to:

Planning Application Ref: 22/1145/FUL

Applicant Name: Union4 Planning Ltd


Description: Comprehensive redevelopment to deliver a new, mixed use neighbourhood, comprising demolition of existing buildings and construction of four residential-led mixed-use buildings of 2 to 6 storeys, including retail, café/restaurant and flexible commercial units (Class E), residential (Class C3) and co-living (Sui Generis) accommodation, pedestrian square and public realm, amenity areas, landscaping, access, parking, servicing and associated works.

Address: Haven Banks Water Lane Exeter Devon EX2 8BY

The application has been reviewed from a primary care perspective and the following comments are provided by NHS Devon ICB 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 Exeter City Council Core Strategy Document 2012 under “Meeting the Communities Needs” states that:

“The objectives of the Sustainable Community Strategy and other strategies and programmes can be delivered, at least in part, through developer contributions sought for social and community infrastructure, including education/skills, health, culture, sports



and leisure facilities. Examples of areas where developer contributions could facilitate change and enhancement include:

.....improving access to health and social care (Exeter Sustainable Community Strategy/Exeter Primary Care Trust Estate Strategy/Royal Devon and Exeter (NHS) Trust Building Programme);”

The ICB’s concern is that the combined surgeries of Ide Lane Surgery, St Thomas Health Centre, Southernhay House Surgery and Barnfield Hill Surgery are already over capacity within their existing footprint 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 44,347 patients registered between them and this new development will increase the local population by a further 990 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 22/1145/FUL

1. Residential development of 434 dwellings
2. This development is in the catchment of Ide Lane Surgery, St Thomas Health Centre, Southernhay House Surgery and Barnfield Hill Surgery which have a total capacity for 32,050 patients.
3. The current patient list size is 44,347 which is already over capacity by 12,297 patients or at 138% of capacity.
4. The increased population from this development = 990
 - a. No of dwellings x Average occupancy rate = population increase
 - b. $434 \times 2.28 = 990$
5. The new GP List size will be 45,337 which is over capacity by 13,287
 - a. Current GP patient list + Population increase = Expected patient list size
 - b. $44,347 + 990 = 45,337$ (13,287 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 = 74.21 m²
 - a. The expected m² per patient, for this size practice = 0.08m²
 - b. Population increase x space requirement per patient = total space (m²) required
 - c. $990 \times 0.075 = 74.21m^2$
7. Total contribution required = **£237,485**
 - a. Total space (m²) required x premises cost = final contribution calculation
 - b. $74.21m^2 \times \pounds3,200 = \pounds237,485$ (£547 per dwelling).



Could you please acknowledge NHS Devon'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.

We would be grateful if you would contact Leenamari Aantaa-Collier at The Wilkes Partnership (Laantaa-collier@wilkes.co.uk; 07866 039931) who can assist your legal department in relation to the drafting of an adequate obligation which assures that the contribution delivers the mitigation requested.

Yours faithfully,



George Grute
Commercial Development Manager
On behalf of:
NHS Devon ICB

