

Technical Note

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Comments to Planning Application.

Gravesham Borough Council

Planning application: 2022/1064

Promoter	Northfleet Central 1 Limited
Address	Land surrounding Ebbsfleet United Football Club, bounded by Lower Road, Railway Line, Grove Road and The River Thames, Northfleet, Gravesend. To be known as Northfleet Harbourside.
Description	Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of up to 3500 residential units (Use Class C3), Class E uses including floorspace for retail Class E(a)), food/beverage and drinking establishments (Use Class E(b)), local services (Use Class E(c)), indoor sport/recreation/fitness (use Class E(d)), healthcare space (Use Class E(e)), creche/nursery uses (Use Class E(f)), office floorspace (Use Class E(g)(i)), a new multi-use stadium with associated business and leisure facilities (sui generis), hotel (Use Class C1), community uses floorspace (Use Class F2). The phased redevelopment will include other sui generis uses, delivery of open space and significant realignment of the road network including the A226 Galley Hill Road / Stonebridge Road / Lower Road with hard / soft landscaping, car and cycle parking provisions, infrastructure works, ancillary and associated works.

Purpose of report

This report is provided by GRIMES LTD on behalf of the Dartford, Gravesham and Swanley Health and Care Partnership and the NHS Kent and Medway Integrated Care Board. It forms the response to the Gravesham planning application 2022/1604 submitted by Northfleet Central 1 Ltd which seeks Outline Planning Consent for the development around Ebbsfleet Football Ground which is close to the Ebbsfleet Central Area although the site is outside the Ebbsfleet Development Corporation (EDC) boundary.

A.G. Grimes MSc, MRICS

Director
GRIMES LIMITED
 199 Hyde End Rd
 Spencers Wood
 Berks
 RG7 1BU

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The Outline Application consent will set the masterplan in place together with the massing and content of the application area and the financial contributions required to provide the public infrastructure required to enable the new community to access the public services to which they are entitled and to ensure neighbouring residents and new residents are not disadvantaged by a lack of public services including health services.

Dartford, Gravesham and Swanley Health and Care Partnership and the NHS Kent and Medway Integrated Care Board will need to work with Northfleet Central 1 Ltd to mitigate the impact of development whilst new permanent healthcare facilities are developed.

Background

The applicant has submitted an application for a Screening Opinion, reference 2022/0852. Gravesham Borough Council responded on 16/9/22 with comments on healthcare provision at paragraph IV. *Health*:

"It is noted that Health will be scoped into the ES (Environmental Statement) but that a technical ES chapter will not be prepared. Instead, a Health Impact Assessment will be submitted. Given the nature of the existing site and surrounding sites and the fact that the development will be phased, the LPA (Local Planning Authority) considers that health should not be scoped out of the demolition, construction or operational phases of development. In terms of the operational phases of the development, the proposal will also result in a

significant uplift in population and increased demand on medical services. The LPA is not convinced therefore in the absence of a proper consideration of likely impacts (which may actually be beneficial if it results in better service provision for existing deprived communities) that it would be unwise to scope health out of the ES. The LPA therefore concludes that health should be scoped in and invites the applicant to engage with it to define what the Health Impact Assessment should cover.”

Work has been undertaken in 2017 with the Greater London Authority (GLA) Healthy Urban Development Unit (HUDU) to model the impact of new housing development on healthcare services within the north-west Kent area including parts of Dartford Borough, the Ebbsfleet Development Corporation area and parts of Gravesham Borough. The modelling was based on known applications for 12,591 new dwellings and this has been revised to cover the 18,500 proposed within the EDC and neighbouring areas including the land around Northfleet Football Ground (Northfleet Harbourside). This work has then been apportioned to the relevant application sites. The modelling was based on the health needs of the existing Dartford and Gravesham population.

The current application is for the Northfleet Harbourside area circa 400 m north of Northfleet Station and includes up to 3500 new dwellings. The application site is circa 1000m from the Ebbsfleet Central site currently being considered by the Ebbsfleet Development Corporation. The Ebbsfleet Central site provides the focal point of the new Ebbsfleet community where significant community infrastructure will be located.

This response specifies the requirements for local health facilities providing primary care, out-patient and Walk-in-Centre services as well as the requirements for expanded hospital services. The local services may be located within the Northfleet Harbourside site or within Ebbsfleet Central or on other sites with the Boroughs of Gravesham or Dartford as agreed with the NHS Kent and Medway Integrated Care Board.

It is noted that the Environmental Statement Volume 3 Technical Appendices contains the Appendix: Socio-economic and health, Annex 2: Rapid Health Impact Assessment which on page 14 states the development will include GP facilities (see the extract below).

ACCESS TO HEALTH AND SOCIAL CARE AND OTHER SOCIAL INFRASTRUCTURE

Assessment Criteria	Relevant?	Details / Evidence	Potential Health Impact	Mitigation / Enhancement Actions
Does the proposal retain or re-provide existing social infrastructure?	Y	The site is currently home to Ebbsfleet United Football Club (EUFC), which plays an important role in the Northfleet community. A new ground for EUFC is a key part of the Proposed Development, and facilities for the club and its supporters will be greatly enhanced.	Positive	None required.
Does the proposal assess the impact on health and social care services and has the local NHS been contacted?	Y	Potential impact on local NHS services has been assessed within the Socio-Economics chapter of the ES. The assessment has found that whilst population growth associated with the Proposed Development will add further strain to already stretched primary healthcare provision in the local area, proposed on-site provision of healthcare facilities is expected to be of sufficient scale to meet the needs of the new population and to begin to address deficiencies in the wider area.	Positive	The Applicant proposes on-site GP Surgery provision.
Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?	Y	The Proposed Development includes the provision of new medical / health facilities within the scheme.	Positive	None required.

The HUDU modelling has identified the impact and capacity mitigation for local services relating to Primary Care, out-patient and Walk-in-Centre services and also on acute hospitals such as the nearby Darenth Valley Hospital, Acute Mental Health services and Intermediate Care services. These additional acute, mental health and intermediate care facilities will be provided on existing sites which have expansion capacity outside the Northfleet Harbourside area. These new facilities have both a capital cost of provision and increased operating costs.

Both Dartford Borough Council and Gravesham Borough Council are progressing to adopt new Local Plans. The Dartford plan has reached the Inquiry in Public stage and the Gravesham plan is progressing from the options consultation. Both these plans will create further housing development across the boroughs in the same timescale as the EDC and Northfleet Harbourside programmes and will place further stress on existing healthcare services and facilities.

The health system within the Kent and Medway ICB area is substantially underprovided in Primary Care Services and has no capacity to absorb new patients from the Northfleet Harbourside development.

Therefore, the Northfleet Harbourside development programme, in accordance with National Planning Policy Framework (NPPF) principles for sustainable development, will need to fully mitigate the impact of development of 3,500 dwellings over the next 10 years up and provide additional healthcare capacity for full occupation of the scheme though fully funded on-site and off-site provision as agreed with the NHS Kent and Medway Integrated Care Board.

Development impact

The impact of 3,500 new homes has been assessed by HUDU as:

ID	Description	Capacity	Floor space sqm	Capital cost excluding VAT at 2017 costs	Predicted costs excluding VAT at 2Q2027
0	New population @ 2.47 per dwelling	8645 persons			
1	Primary Care	5 WTE practitioners	818	£3,700,387.00	
2	Outpatient/Walk in Centre services	11 rooms	519	£2,117,150.00	
	Total lines 1&2		1337	£5,817,537.00	£8,345,761.00
3	Acute medical services	19.03 beds	914	£4,796,060.00	£6,880,317.00
4	Acute mental health services	2.72 beds	133	£704,052.00	£1,010,023.00
5	Intermediate Care services	1.01 beds/ 1.5 day- spaces	138	£678,363.00	£973,170.00

The construction costs were calculated in 4Q2017 at the ONS cost index of 106.4 which increased to 127.2 at the end of 2Q2022 representing an increase of 19.5 %. The September 2022 BCIS five-year forecast for building covering 2Q2022 to 2Q2027 anticipates a further 20% rise in costs totalling 43% over the 2017 indicative costs.

The proposed development costs exclude land costs. It is assumed that the NC1L will fully fund the cost of construction and the cost of land for new or expanded health facilities and that the NHS will not be charged rent on any land or buildings required to meet the needs of the new population.

It is assumed, whilst NHS providers of the expanded acute, mental health and intermediate care services will provide the expanded services on existing sites outside the Northfleet Harbourside area, that NC1L will fund the costs of capital development for these services to meet the needs of the new population.

The Design and Access Statement indicates, at paragraph 7.2, that new housing will be occupied from years 2-4 of the construction programme which will last 10 years. The NHS will require NC1L to ensure that capacity is available for new residents in either appropriate temporary facilities or permanent facilities.

The interim facility and permanent primary care, out-patients and Walk-in-Centre health facility should be entirely funded by NC1L including design, construction, equipping (furniture, equipment, IT systems) VAT and capitalisation of any leases. Contributions to all NHS developments should be index linked through to project completion.

Funding will also be required to cover the higher and unfunded cost of operating services and facilities as the population grows which covers:

ID	Item description	Cost at 2022 prices
1	Under absorption of estate costs during population build-up Average underutilisation of 20% over 10 years	£327,227.00
2	Under-absorption of staff during population build-up over 5 years	£324,188.00
3	Pump priming GP costs until NHS Capitation funds the new population over 3 years	£ 389,025.00
	Total	£1,040,440.00

Location

The healthcare facilities, either interim or permanent, should comply with all applicable NHS design guidance at the time of detailed design including Health Building note HBN 11-01 or any successor and Health Technical Memoranda's (HTM's). All design work on either shell and core or full fit out shall be approved by the Dartford, Gravesham and Swanley Health and Care Partnership and the NHS Kent and Medway Integrated Care Board and its estates advisors before implementation.

The health facility should be designed and built with all clinical rooms and offices being provided with natural daylight. The facility entrance should be located at ground level and accommodation should be at ground level or on floors immediately above the entrance floor with internal vertical circulation fully compliant with the Equalities Act, 2010.

To ensure the health facility can be brought forward at the earliest time it should be located in a building on a development site at the edge of the site or which can be made accessible to the public at the earliest point in time preferably no later than 2026/7.

Any temporary facility should be provided on an accessible site to support demand as it grows between 2023 and 2027. This facility may need to be 200 – 800 sqm depending on the exact profile of population growth and the date of opening of the permanent facility.

The facility should be close to bus stops on the proposed Fastrack networks and to car parking which should include at least 4 disabled spaces at ground level. Disabled drop-off bays and an ambulance parking bay should be located immediately outside the entrance together with secure bicycle storage. The car park should include at least 4 reserved spaces for staff vehicles required for home visits.

NC1L should develop and seek approval from the Dartford, Gravesham and Swanley Health and Care Partnership and the NHS Kent and Medway Integrated Care Board for the location and scope any interim facility.

Recommendation

That Dartford, Gravesham and Swanley Health and Care Partnership and NHS Kent and Medway Integrated Care Board find the planning application acceptable if the Northfleet Harbourside health facilities are funded and provided as requested in this report.

That the NHS organisations continue to engage with NC1L on the detailed planning of the scheme temporary and permanent health facilities.