

Date: 1 March 2024

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Gravesham Borough Council
Planning & Regeneration Services
Civic Centre
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Gravesend
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Primary Care Estates Team

Gail House
2nd floor, Lower Stone Street
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Kent
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Email: kmicb.gpestates@nhs.net

Our Ref: 20240013

Dear Ethan,

Letter reference: Former St Joseph's Convent Preparatory School 46 Old Road East
Gravesend Kent DA12 1NR

NHS Kent and Medway Integrated Care Board (The ICB) has responsibility for planning healthcare services in Kent and Medway and reviews planning applications to assess the direct impact on healthcare.

I refer to the above full planning application which concerns the proposal to provide a mixed-use development comprising of a new 3-storey GP surgery and 54 new residential dwellings.

The planning application includes a new primary care medical facility for Pelham Medical Practice. Support was initially provided by the former Kent and Medway Clinical Commissioning Group in October 2021 to develop detailed plans for a business case for relocation to a new facility.

The proposal will provide capacity for growth in new patient registrations resulting from the developments in the Gravesham area. Pelham Medical Practice is currently undertaking a patient and stakeholder engagement regarding their proposal which will inform the practice business case.

As part of the standard ICB process for general practice premises developments detailed plans and development appraisal, once finalised, will be fully assessed. The final business case submission to the ICB will require confirmation that planning permission has been granted for the proposed facility and that the proposed scheme is value for money.

NHS Kent and Medway has also assessed the implications of the residential aspect of this proposal and will request the payment of an appropriate financial contribution as detailed below.

In line with the Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) requests for development contributions must comply with the three specific legal tests:

1. Necessary

2. Related to the development
3. Reasonably related in scale and kind

We have applied these tests in relation to this planning application and can confirm the following specific requirements. **The calculations supporting this requirement are set out in Appendix 1.**

	Total Chargeable units	Total (See Appendix 1)	Project
Healthcare services provided in the community	54	£46,656	Towards the build cost of the new primary care medical facility proposed as part of this application.

The obligation should also include the provision for the re-imbursement of any legal costs incurred completing the agreement (where relevant).

Justification for infrastructure development contributions request

This proposal will generate approximately 130 new patient registrations in general practice based on the dwelling mix provided in Appendix 1. The proposed development falls within the current practice boundary of Pelham Medical Practice who are seeking support for the relocation to the new healthcare facility being proposed. The ICB's preferred option would be that this financial contribution is made available in full prior to commencement of the healthcare facility build on site and used specifically as a contribution towards this project.

The development does however also fall within the boundaries of Old Road West Surgery, Rochester Road Surgery, The Shrubbery Surgery, Springhead Health and Swanscombe Health Centre. In the event that the S106 funding cannot be agreed as above, we request the right to use the contributions on projects to increase capacity.

I would be grateful if you could advise me of the Council's decision in due course, should you require any further information, or points of clarification in the meantime please contact me using the above email address.

Yours sincerely

Sent via email

Funmi Owolabi
Senior Programme Manager

Appendix 1

NHS Kent and Medway currently uses a formula for calculating s106 contributions which has been used for some time and is calculated as fair and reasonable. This calculation is based the number of proposed units multiplied by the assumed occupancy multiplied by £360.

Where the application identifies unit sizes the following predicted occupancy rates will be used.

1 bed unit @ 1.4 persons
2 bed unit @ 2 persons
3 bed unit @ 2.8 persons
4 bed unit @ 3.5 persons
5 bed unit @ 4.8 persons

Where the unit sizes are not identified then an average occupancy of 2.4 persons will be used.

The calculations for this development are:

Based on the dwelling mix provided:

$$54 * 2.4 = 129.6$$

$$129.6 * 360 = £46,656$$