

Matthew Broome
Planning Department
Tonbridge & Malling Borough Council
Gibson Building
Gibson Drive
Kings Hill
West Malling
ME19 4LZ

Primary Care Team
Wharf House
Medway Wharf Road
Tonbridge
Kent, TN9 1RE

Tel: 03000 425158
Email: wkccg.primarycare@nhs.net

Our Ref: TM/19/00014/OAEA

Date: 18 February 2019

Dear Matthew

Ref: TM/19/00014: Land North of Lower Haysden Lane, Tonbridge

NHS West Kent Clinical Commissioning Group (CCG) has delegated co-commissioning responsibility for general practice services in West Kent and is the body that reviews planning applications to assess the direct impact on general practice.

I refer to the above outline planning application which concerns the proposed residential development comprising 125 new dwellings and understand that this forms part of the general strategic site in South West Tonbridge detailed in the new Local Plan.

The CCG has assessed the implications of this proposal on delivery of general practice services and is of the opinion that it will have a direct impact which will require mitigation through the payment of an appropriate financial contribution.

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	Project
General Practice	125	£105,480	Towards refurbishment, reconfiguration and/or extension at Warders Medical Centre and/or Hildenbrough Medical Group.

The obligation should also include the provision for the re-imbusement of any legal costs incurred in completing the agreement.

Justification for infrastructure development contributions request

This proposal will generate approximately 293 new patient registrations based on an average of 2.34 per dwelling.

There is currently limited capacity within existing general practice premises to accommodate growth. The need from this development, along with other new developments in the area, will need to be met through the creation of additional capacity in general practice premises. It is not possible at this time to set out a specific premises project; we can however confirm that the contribution will support refurbishment, reconfiguration or extension at Warders Medical Centre and/or Hildenborough Medical Group. Any premises plans will include the pooling of S106 contributions where appropriate.

Planning for growth in general practice is complex; physical infrastructure is one element but alongside this workforce is a critical consideration both in terms of new workforce requirements and retirements. Any plans developed need to support delivery of sustainable services for the future.

General practice premises plans will be kept under regular review and priorities may be subject to change as the CCG must ensure appropriate general medical service capacity is available as part of our commissioning responsibilities.

We request that any agreement regarding a financial contribution also allows the contribution be used towards new general practice premises in the area (should this be assessed as a requirement at a point in the future) and also for professional fees associated with feasibility or development work for existing or new premises. In addition and in order to support the proactive development of premises capacity we request that the trigger of any healthcare contribution be available linked to commencement or at an early stage of development.

The CCG is of the view that the above complies with the CIL regulations and is necessary in order to mitigate the impacts of the proposal on the provision of general practice services. In accordance

with CIL regulation 123 the CCG confirms that there would not be more than four other obligations towards the final project(s).

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



Gail Arnold
Deputy Managing Director – Dartford Gravesham and Swanley CCG and Swale CCG
Primary Care Portfolio Lead West Kent, North Kent and Medway

Appendix 1

The CCG 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 assumed average occupancy of 2.34 persons will be used.

The calculation for this development is set out below:

The application does not detail the unit sizes and should be updated (based on the above) once the final unit sizes are confirmed at a later date. The calculation is therefore as follows:

125 units X 2.34 average occupancy = 293 people
292.5 people X £360 = £105,480