

Date: 27th April 2021

Reference: **Planning application 60823**

Outline application for 250 dwellings (use class c3). Former Yelland Power Station, Lower Yelland, Yelland, Barnstaple, Devon, EX31 3EZ.

Title: **Devon Clinical Commissioning Group (CCG) NDDC Planning Committee Statement**

This is a response to the officer's report in relation to the above proposed development on behalf of the NHS Devon Clinical Commissioning Group (CCG) who are responsible in provision of the primary health care in the local community. Please note that the CCG has provided a consultation response on behalf of the affected Fremington Medical Centre.

The health of communities has been a key element of Government policy¹ for many years and is reflected in adopted development plan. The Local Plan Policy FRE02 clearly expresses that this development will create an impact on the Fremington Medical Centre and contribution towards an expansion is required to alleviate that impact.

Over recent years the Medical Centre has both expanded and re-configured its practice to meet the ever-increasing demands for its services therefore, without appropriate mitigation, which will allow further expansion of the Medical Centre, this development will create a significant impact on the accessibility of primary care services. In practical terms, this means that occupants of the proposed development and the existing community will have longer waiting times, reduced ability to use closest GP practice and often having to resort to unnecessarily use of A&E causing a detrimental knock on effect on the acute services.

¹ NPPF Section 2 paragraph 8, Section 8 paragraphs 91 and 92



It is very concerning that the officer has concluded that the application includes 'community/services' and this gives an impression that community facilities/ services will deliver the needed health service (paragraph 15.15 of the officer's report). Although not very clear from the officer's report it seems that for this reason there is no need for a contribution towards primary care. We can confirm that offered 'community/services' **will not deliver** any NHS primary care services. As a result there is nothing in the application that would alleviate the impact that it will create on the health of the community. The request from the CCG for £[REDACTED] is both proportionate and directly relevant to this development and is necessary to fund the expansion of the practice.

We understand that the Site has some viability issues. However, viability should not compromise sustainable development.

The officer's conclusion on the sustainability is misleading, as it fails to recognise the significant impact that this proposed development will have on its future occupants and existing community, their ability to access health services and consequences of the same. This is clearly against the Council's own Local Plan Policy and NPPF. There is no explanation in the review of the viability assessment or in the officer's report why the recommendation is to prefer other requests for contributions to the health contribution.

If there is no adequate mitigation by way of contribution, which allows the expansion of the current services, then the development of primary care services will be impeded as the practices will be unable to accommodate the workforce required to meet population growth. Additionally, this will restrict the ability to take forward the integrated, multi-disciplinary working with other health and social care providers as set out in the NHS Long Term Plan, part of widening health inequalities. This all will have a significant socio-economic impact on local community.

Finally, the decision-maker should have a regard to its obligations pursuant to section 149 of the Equality Act 2010. The decision-maker is required to, inter alia, take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The protected characteristics include age and



disability. It is not evident from the officer's report that any regard has been given to section 149 obligation.

