

Liz Shutler  
Executive Director of Strategic  
Development and Capital Planning

Amanda Harrison  
Director of Assurance and  
Strategic Development

## **DOVER HEALTHCARE**

### **Update on Progress made since 30<sup>th</sup> September HOSC**

1. On October 19<sup>th</sup> 2009 an independently facilitated stakeholder event was held in Dover with a broad range of invited stakeholders including the local MP, members of the public, stakeholders previously involved in discussions on Dover, representatives of patient and local interest groups, councillors and officers from DDC, representatives from the Environment Agency (EA), East Kent Hospitals University Foundation Trust (EKHUFT) and the local Practice Based Commissioning (PBC) consortium. The meeting was asked to evaluate each site against the previously agreed criteria, there was also an open question and answer session which allowed people to express their views on the potential sites (Appendix 1).
2. This session enabled us to re-evaluate all the sites previously considered, the mid-town site, the existing Buckland Hospital site and potential sites at Whitfield, to take in to account any changes which had occurred since the original evaluation. In addition two further sites potential sites were identified. These were Buckland Mill and the Charlton Green/Post Office site in the centre of Dover as illustrated in Appendix 2.
3. Using information gained from the stakeholder event the above five site options have been considered in greater detail against each of the criteria outlined above. The outcome of this analysis is shown in Appendix 3.
4. A report was submitted to the Board meeting of the NHS Eastern and Coastal Kent on the 18<sup>th</sup> November 2009 asking for the earlier recommended site proposal be amended, as a consequence of the high risks now associated with the mid town site and the advice that it would not pass the sequential planning test as there were appropriate, reasonably available alternative sites for the development in a lower flood risk zones.
5. The Board of NHS Eastern and Coastal Kent was informed that although Dover District Council remain confident that the flood risk on the mid town site can be addressed indications from the Environment Agency are that where similar work has been carried out elsewhere it has taken a number of years to deliver and that if planning permission were sought for the hospital development on this site without clear plans for mitigating all aspects of the flood risk then they would appeal the decision resulting in a referral to the Secretary of State for consideration. Proceeding with a development on this site must therefore be considered high risk.
6. The Board agreed that in order to move forward as rapidly as possible it was necessary to balance the risks and opportunities of each site. Whilst a full

assessment will be carried out in the Outline Business Case (OBC) and Full Business Case (FBC) as developed by EKHUFT in support of the development it is clear that some sites should be ruled out at this stage to avoid delay. The Board of NHS Eastern and Coastal Kent agreed that from the evaluation of the Mid Town, Charlton Green and Buckland Mill sites it was clear that these sites carry significant risks without conferring significant advantages over the other sites under consideration.

7. Whilst there are limitations with all sites considered both the potential Whitfield sites and the current Buckland Hospital site were considered by the Board of NHS Eastern and Coastal Kent to provide appropriate, reasonably available sites for the development in lower flood risk zones. It was agreed that both these options would meet the health needs of the people of Dover and provide the opportunity for a timely development. The NHS Eastern and Coastal Kent Board noted that the development would be undertaken by EKHUFT and therefore it would be for the Board of EKHUFT to make a decision about which of these sites offered the best option in respect of rapid delivery and affordability. The Board decision was as follows:

*It was resolved that the Board recommends a new community hospital be developed by EKHUFT through a proper process of Outline and Full Business Case Development to deliver Dover Practice Based Commissioning intentions; that in developing the business case EKHUFT considers the most appropriate site for development utilising the information already gathered in the Board report and further assessing the potential sites against the criteria given with a priority on delivering the most affordable and rapidly deliverable option; that EKHUFT ensures that there is an ongoing process of engagement with all stakeholders to ensure they are kept informed of the progress of the development (NHS Eastern and Coastal Kent Board minutes, November 2009).*

8. In addition to the process which EKHUFT will lead to develop a business case for the estate development, the PCT will continue to work with PBC to develop the required commissioning intentions for services to be delivered from the site and elsewhere in the Dover locality. Throughout this process the PCT will ensure that there is appropriate and ongoing stakeholder engagement by EKHUFT and the PCT and that all business cases and commissioning intentions are supported by the required Equality Impact Assessments and relevant action plans.
9. The EKHUFT Board met on the 27<sup>th</sup> January to agree their position on the development of a new Community Hospital in Dover. The Board considered the OBC which identified the preferred option as a new build at Buckland Hospital. As detailed in the Trust's unconfirmed minutes, it was agreed that:

*“Given the economic downturn and the financial position of the Trust, it is recommended that the preferred option is supported and that the case continues to be developed to FBC stage, for review by the Board of Directors as planned.*

*This will be subject to confirmation of the availability of capital to support the development and the other priorities within the Trust's wider capital programme.”*

## Outstanding Issues

10. In the last year the commissioning intentions of the Dover and Aylesham Practice Based Commissioning Consortium (see Appendix 5) have continued to be refined and further developed. It is expected that this will be an ongoing and continuous process as the PCT and PBC respond to local health needs and the challenges of improving quality, productivity and patient experience. EKHUFT will through the development of an OBC and FBC for the development need to ensure that it is financially viable and continues to provide a robust and flexible solution for the estates required to deliver the services that the PCT and PBC wish to commission. There is a risk that the business case demonstrates the development is unaffordable. Mitigating this risk will require an ongoing dialogue as the business cases are developed and ratified by the EKHUFT Board. It will be important to continue to develop an understanding of the levels of activity and costs of services which will be delivered from the site and the impact as many/most of these services are transferred from their current delivery sites to better meet the needs of the Dover population. The PCT and EKHUFT will need to take action to ensure the development is affordable this will include the potential of the site to be a location for services commissioned from a range of providers.
11. The business cases will need to take into account any additional cost relating to each site including:
  - Site purchase
  - Legal fees
  - Installation of utilities
  - Costs of addressing planning issues e.g. flood risk
12. There is a significant risk that delaying the delivery of the development any further will impact on the potential for EKHUFT to take the development forward through capital investment. The development is part of a planned programme of capital investment in the EKHUFT estate over the next three to five years which includes developments on the main acute sites in order to provide single rooms for in-patients. EKHUFT have indicated that currently the Dover development is still part of its overall programme but that it will need to complete within two years to ensure it does not impact on other elements of the programme.
13. Many of the sites have potential time delays which will need to be addressed as the OBC and FBC are developed. These include:
  - Planning issues
  - Flood risk with potential mitigation not currently defined or delivered (see appendix 6)
  - Site acquisition where sites are in multiple ownership
  - Legal issues

**Public views expressed at the meeting on 19<sup>th</sup> October:**

Buckland: + within area of high deprivation, probably no flood risk, deliverable  
- access constrained, parking difficult, possibly contaminated site

Whitfield: + potential for expansion, easier access for rural communities, access could be improved  
- remote from areas of greatest need, poor access, possible planning constraints

Midtown: + would meet local needs, in centre of areas of deprivation, access good  
- flood risk will impact on delivery timescale, car parking, little expansion

Buckland Mill: + access, site size adequate, car parking,  
- land may be prohibitively expensive, flood risk possible

Charlton Post Office: + central Dover site, in centre of areas of deprivation  
- site size constrained, land in multiple ownership, parking



SITE	MID TOWN	WHITFIELD	BUCKLAND	CHARLTON GREEN	BUCKLAND MILL	COMMENTARY
<b>CRITERIA</b>						
<b>Commissioning Intentions</b>	YES	YES	YES	YES	YES	All sites have the ability to deliver commissioning intentions but there are risks associated with all options.
<b>Car parking</b>	YES - site would include parts of the existing DDC and PCT owned car parks but additional space would be made available as part of the scheme at William Muge House	YES - dependant on the size of the site purchased	YES - would impact on the amount of land available for sale	YES – but parking on site limited; could utilise William Muge House but further away and therefore less accessible	YES - but limited with no realistic options elsewhere	
<b>Accessibility</b>	56.2	30.7	34.3	49.3	43.1	KCC data - % of households able to access the site within 30 minutes by public transport or on foot
<b>Flexibility/ Future Proofing</b>	Potential for future expansion including on health centre site	Potential for future expansion	Potential for future expansion	Restricted site with limited options for future expansion	Limited site area with correspondingly limited opportunities for expansion	

SITE	MID TOWN	WHITFIELD	BUCKLAND	CHARLTON GREEN	BUCKLAND MILL	COMMENTARY
<b>CRITERIA</b>						
<b>Deliverability</b>	Site in Public Sector ownership (including William Muge House) All utilities available on site. Adjacent to site currently used for health services	Site in Private Sector ownership. Change of planning use required, , likely to cause delay, public transport realignment required	Site in Public Sector ownership – EKHUT. All utilities available on site. Site used for health provision currently	Site in multiple ownership. Acquisition likely to be complex. All utilities available on site	Site part of larger redevelopment. All utilities available	
<b>Value for money</b>	Potential for additional build costs in relation to flood risk and building in developed area Site purchase costs within public sector partnership	Site costs unknown but will be at open market rate. Potential for costs associated with installing utilities and road infrastructure	No site purchase cost but new build on this site may limit value of remaining land	Site costs unknown but will be at open market rate.	Site costs unknown but initial discussions have suggested these will be high	
<b>Adjacencies with other health services</b>	Close to majority of GP surgeries and dentists. Pharmacies nearby	Distant from majority of existing GP surgeries. Pharmacy near by.	Close to some existing GP surgeries. Pharmacies near by	Close to majority of GP surgeries and dentists. Pharmacies nearby	Close to some existing GP surgeries. Pharmacies near by	See Map 2 and 3
<b>Location</b>	In centre of wards with highest health need and deprivation	Outside areas of deprivation	Good access from St Radigund's ward one ward with high	In centre of wards with highest health need and deprivation	Good access from St Radigund's ward one ward with high	See Map 4

SITE	MID TOWN	WHITFIELD	BUCKLAND	CHARLTON GREEN	BUCKLAND MILL	COMMENTARY
<b>CRITERIA</b>						
<b>Flood/EA Risk Assessment</b>	YES.	YES	NO	YES	YES	See Appendix 3 for initial views from the EA on each of the five sites
<b>Wider considerations</b>	Likely to have positive impact on regeneration	Moves services away from centre of regeneration	No positive impact on regeneration	May have some impact on regeneration	May have some impact on regeneration	
<b>Risk rating</b>	HIGH	MEDIUM	LOW	HIGH	HIGH	



Date/	2010		
Organisation	January	February	March onwards
<b>NHS Eastern and Coastal Kent</b>	27 <sup>th</sup>		PCT and EKHUFT consider/discuss implications of EKHUFT OBC and impact on financial and commissioning decisions.
<b>NHS Health Overview and Scrutiny Committee</b>		5 <sup>th</sup> NHS ECK and EKHUFT to report progress and confirm site to HOSC along with rationale. EKHUFT leads subsequent communication as required	
<b>East Kent Hospitals University Foundation Trust</b>	27 <sup>th</sup> Board considers OBC  EKHUFT leads communication with stakeholders in advance of the meeting. Media messages agreed with PCT		

# Dover and Aylesham PBC Consortium

**Please reply to:** Dover PBC Consortium c/o The High Street Surgery  
100 High Street Dover Kent CT16 1EQ  
Tel. 07891 620079

Date: 19<sup>th</sup> October 2009

## A Statement

From: The Dover & Aylesham Practice-based Commissioning (PbC) Consortium

### Re: The development of a new healthcare facility for Dover

This statement confirms the current position of the Dover PbC Consortium.

The Consortium completed a comprehensive Commissioning Intentions document for health services for Dover in July 2008. This document has been compiled with help from, and the full support of, NHS Eastern and Coastal Kent Commissioning Team and received the approval of the NHS Eastern and Coastal Kent Board in 2008.

The commissioning intentions are underpinned by the need for and development of locally accessible and appropriate healthcare facilities. The effective delivery of health and wellbeing services in Dover is dependent on the building of a significantly improved healthcare facility. It is anticipated that this will require a new Dover hospital.

The primary concern of the Dover PbC Consortium is to ensure that any new build enables us to implement our commissioning intentions as soon as possible.

The main criteria agreed by the Consortium as prerequisites for a healthcare facility site are that it must:-

1. Be easily accessible to the majority of the Dover District population, including the more economically deprived areas – ‘accessibility’ to mean not only transport, but also hours of clinical service and a comprehensive range of services that deliver care locally.
2. Support current services and enable the development of additional and improved services.
3. Be served by comprehensive and efficient public transport links and provide appropriate car-parking for patients and staff.

The Consortium, at present, does not have a preferred location for the facility but it is clear that the current Buckland Hospital buildings are not fit for purpose.

We are committed to commissioning intermediate care beds on one site with a preference that they are integrated or co-located on the new hospital site.

Statement

ends.

November 2009



## Dover Alternative Hospital Sites

We have looked at all of the sites suggested for locating your new medical facility and have put together a brief summary of our requirements for each location. We have highlighted the broad environmental constraints we can see at each of the sites.

Once you choose your preferred site, we will be able to provide a more detailed understanding of the constraints and opportunities related to the specific design and siting of your development.

We would be happy to look at any assessments prior to any planning application being submitted to the Council, so that we can offer advice and guidance on any areas of concern.

### The sites:

#### 1. Buckland Mill

Requirements: Flood Risk Assessment/Drainage Strategy  
 Land Drainage Consent (possible)  
 Scheme to address contamination (possible)  
 Ecological Assessment (possible)

#### Flood Risk

A site specific Flood Risk Assessment was completed to accompany an outline planning application at this site. You could use this assessment as a starting point for your own investigations if you chose to take this site forward. This Assessment confirmed some areas of the site to be in Flood Zone 1<sup>1</sup> although others parts would be in Flood Zones 2 and 3. The site also has some Areas Susceptible to Surface Water Flooding.

The best location for the hospital would be in the lower risk parts of the site (to the north) and providing access to Crabble Hill so there would be a dry escape route. If the hospital was located entirely within Flood Zone 1 all we would require would be a Flood Risk Assessment focussing on drainage (Drainage Strategy). The Sequential and Exceptions Tests<sup>2</sup> would not be required if the site was located to the north in Flood Zone 1, entirely out of Flood Zones 2 and 3.

<sup>1</sup> Flood Zones are defined in Annex D of [Planning Policy Statement 25](#). The overall aim of decision makers is to steer new development to Flood Zone 1.

<sup>2</sup> The Sequential and Exceptions Tests are also explained in Annex D of Planning Policy Statement 25.

Government policy strongly encourages a sustainable drainage system (SUDS) approach, and we would recommend the inclusion of sustainable drainage at this site particularly as part of the site is in an Area Susceptible to Surface Water Flooding.

A Flood Risk Assessment would still be required for this site if it was in Flood Zones 2 or 3, and the assessment would have to include the results of both a Sequential and Exception Test (PPS 25).

Please keep in mind that Land Drainage Consent may be required if any construction or other works was proposed near or in the River. We can advise you at a later stage, if this site was taken forward.

### **Groundwater and Land Contamination**

This site is a brownfield site and therefore there may be land contamination as a result of the previous use of the site. The site is also partially located in a Source Protection Zone 3.

You may need to submit a scheme to address the risks associated with potential contamination of the site. The components of that scheme are explained in Appendix A. However, previous planning applications have been submitted for this site with schemes to deal with the contamination. Therefore, you may be able to use any previous assessments to inform your development choices, and/or some remediation may have already taken place? It would be wise to get confirmation from Dover on the status of the site and their requirements.

### **Biodiversity**

The Buckland Mill site sits adjacent to the River Dour which is a natural chalk stream. There are opportunities at this site to further improve the River and it's surrounds for biodiversity and improve access to the River for the public.

However, the location of your medical facility on the Buckland Mill site, and associated works will determine whether there are any impacts, or opportunities for enhancement.

If the proposed facility was adjacent to the River, we would want confirmation of the developments impact on the wildlife and habitats of the River. We are aware that previous planning applications have been submitted for this site, including ecological assessments, therefore it would be wise to explore these permissions to find out what assessments, and work have already been undertaken.

## **2. Charlton Green Sorting Office**

Requirements: Flood Risk Assessment  
Scheme to address contamination

### **Flood Risk**

There are flooding problems at this site, and Dover District Council's Strategic Flood Risk Assessment (SFRA), says that part of the site is within Flood Zone 3A. This is the area fronting Charlton Green road. The site is also partially located in an Area Susceptible to Surface Water Flooding. Dover District Council wrote in their SFRA that surface water flooding occurred along Charlton Green in 2003. Their SFRA concludes that the site should be considered "high risk".

A Flood Risk Assessment would be required for this site, and the assessment should include the results of both a Sequential and Exception Test. However, given that a significant part of the site is within Flood Zone 1, and it is likely a dry escape route can be achieved from Frith Road and Salisbury Road, it is possible this site could be considered acceptable in terms of flood risk. However, it would be useful to consider the design, including flood mitigation at an early stage.

### **Groundwater and Land Contamination**

This site is a brownfield site and therefore there may be land contamination. The site is also located in a Source Protection Zone (SPZ) 1. We designate Source Protection Zones to protect drinking water supplies from pollution. Source Protection Zone 1 is the Zone closest to the drinking water supply abstraction point.

You would need to submit a scheme to address the risks associated with potential contamination of the site, particularly the risks posed to the drinking water supply. The components of that scheme are explained in Appendix A.

### **3. Whitfield**

Requirement: Flood Risk Assessment/Drainage Strategy

#### **Flood Risk**

Your suggested site at Whitfield is in a Source Protection Zone 3, as well as Flood Zone 1.

Any development site greater than 1 hectare, particularly on a Greenfield site, would require a Flood Risk Assessment focussing on drainage. This is because the proposed scale of the development could present risks of flooding on-site and/or off-site if surface water run-off were not effectively managed. The Assessment is an opportunity to show how the surface water drainage would be managed.

Government policy strongly encourages a sustainable drainage system (SUDS) approach, and we believe a good surface water drainage scheme would not be hard to achieve.

The site also lies on clay with flint deposits that in turn overlie the upper chalk formation; this is classified as a non-aquifer overlying a major aquifer. This means that your design will have to take account of the chalk aquifer, and the height of the groundwater table.

### **4. Buckland Hospital**

Requirements: Scheme to address contamination

#### **Flood Risk**

Our Flood Map shows Buckland Hospital is located in Flood Zone 1. I understand you propose to build on the car parking area of the existing hospital, and having measured this area it appears to be less than 1 hectare in size. For developments less than 1 hectare in Flood Zone 1, the main flood risk issue to consider is usually the management of surface water run-off.

As the site appears to be less than 1 hectare we would not require a Flood Risk Assessment. However, if the site to be developed is extended to over 1 ha we would require a Flood Risk Assessment to be submitted with any planning application. The

Flood Risk Assessment would have to demonstrate how surface water drainage was to be managed to avoid any flood risk.

### **Land Contamination**

This site is a brownfield site and therefore there may be land contamination associated with its use, or previous uses. You would need to submit a scheme to address the risks associated with potential contamination of the site. The components of that scheme are explained in Appendix A. The preliminary risk assessment would identify if there was potential contamination at the site.

## **5. Midtown Site**

Requirements:      Flood Risk Assessment  
                            Land Drainage Consent (possible)  
                            Scheme to address contamination  
                            Ecological Assessment (possible)

### **Flood Risk**

The entire site available for the hospital is within Flood Zone 3. We would require a Flood Risk Assessment for this site, and the assessment should include the results of both a Sequential and Exception Test as explained in Planning Policy Statement 25 (Development and Flood Risk).

As part of the Flood Risk Assessment you would also have to demonstrate how you would achieve a dry escape route, and dry access to the site in the event of a flood, as well as appropriate flood mitigation or protection. Unfortunately, no reports we have seen previously have been able to demonstrate these, so it is important that these issues are a priority for investigation if you were to proceed with this site.

As well as being in a Flood Zone, the site is also located in an Area Susceptible to Surface Water Flooding. Southern Water Services have also identified the site as being at risk to flooding from the combined foul sewerage system.

### **Land Contamination**

This site is a brownfield site and therefore there may be land contamination associated with its use, or previous uses. You would need to submit a scheme to address the risks associated with potential contamination of the site. The components of that scheme are explained in Appendix A. The preliminary risk assessment would identify if there was potential contamination at the site.

### **Biodiversity**

The site sits adjacent to the River Dour which is a natural chalk stream. There are opportunities at this site to further improve the River and it's surrounds for biodiversity and improve access to the River for the public.

We would want an assessment to be submitted with any planning application, emphasizing the development's impact on the wildlife and habitats of the River, as well as mitigation, compensation or enhancement measures that might subsequently be proposed. However, the location of any buildings or associated works will determine whether there are any significant impacts, or opportunities for enhancement.

## **Appendix A**

## Components of a Scheme to Address Contamination.

1. A preliminary risk assessment which has identified:
  - all previous uses
  - potential contaminants associated with those uses
  - a conceptual model of the site indicating sources, pathways and receptors
  - potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The site investigation results and the detailed risk assessment (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.