

Case Officer
Wokingham Borough Council
Email: planning.enquiries@wokingham.gov.uk

Unipart House
Oxford
OX4 2PG

07 August 2024

Dear Case Officer,

Planning Ref.: 241567 - Land East of Longwater Road, Longwater Road, Finchampstead, Wokingham, RG40 3TS

Thanks for consulting the NHS Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board (ICB). Integrated Care Board is a statutory NHS organisation, which was established on 1 July 2022 by The Integrated Care Boards (Establishment) Order 2022 and has the delegated function of commissioning of primary care services. ICBs now carry on all CCGs functions including the commissioning of primary care services including GPs. NHS Buckinghamshire, Oxfordshire & West Berkshire Integrated Care Board (ICB) formally replaced the former Berkshire West Clinical Commissioning Group (CCG) on 1 July 2022 and carries on all CCG functions as far as they relate to primary care and its estates. The ICB however has no dedicated funding for any primary care estates development in their annual budgets.

Primary healthcare estates including GP premises are funded through reimbursement of rents and business rates by the ICB. The rent will then be assessed by the District Valuer, given that the ICB will reimburse that rent. As a primary care commissioner, the ICB therefore has a responsibility to ensure that any primary care provision is financially affordable and operationally viable. Rental valuation of any new primary care facility should get an internally approval from the ICB, as the ICB will need to take into account whether the new rent is affordable to the NHS. The rental value will also need to be considered and agreed by the District Valuer.

Projected population increase

This full planning application is seeking to deliver 40 residential units to the application site. The ICB has a standard formula to work out the predicted population increase. This can be achieved through using average household size. Currently, an average household size of 2.4 is adopted in Wokingham. Based on the calculation, there will be a predicted 96 increase in population in the area.

CIL contributions towards health facilities

According to Wokingham Borough Council Infrastructure Funding Statement 2022 to 2023, no CIL contribution was used towards health facilities¹. The ICB is currently working with the Council to discuss the potential of the use of CIL contributions towards health facilities. By the time of writing this letter, no formal agreement is reached between the Council and the ICB regarding the use of CIL funding towards health facilities.

Local GP capacity

The adopted Council's Core Strategy sets out that development will take account of the health, wellbeing and quality of life of the borough's residents. To achieve this objective, adequate GP service is required to serve residents. This is also the responsibility of the ICB, as a primary healthcare commissioner.

While there is no national guidance in setting out the capacity of a GP practice, NHS England size and space standards set out the size of GP premises in GIA in relation to the number of patients to be accommodated at the premises. This standard is in line with the NHS Property Services Demand Assessment Tool². For a GP practice which has a patient list size over 18,000, a minimum of 1,250 square metres of GIA is required.

The closest GP practice is Finchampstead Practice, which currently has a patient list size of 18,497 (as at July 2024) and a gross internal area (GIA) of 639.7 square metres. As Finchampstead Practice has a GIA of 639.7 square metres, it shows that the Practice is already over-capacity and does not have capacity to accommodate any new patients from the proposed development.

The other assessment is based on the ratio between GPs and patients. The Royal College of GPs guidance sets out that the best practice is 1,800 people per one full-time GP. This is not a statutory guidance but is a nationwide acceptable guidance regarding the ratio between patient per GP. Currently the Finchampstead Practice has 9 GP in total (8.1 GP full-time equivalent). The capacity of the Practice should be 14,580 patients. As discussed in our representation letter, the number of registered patients at the Practice is over 18,497 patients. It implies that a minimum of 10.2 GPs (round up to 11 GPs) is required. Though workforce issue is not a relevant material consideration when assessing a planning application, given the current floorspace is below the standard, it implies that the Practice will not have adequate clinical space to accommodate any new GP workforces.

Primary Care Mitigation

The ICB has a standard formula to work out the amount of financial contribution based on the predicted population increase and then multiplied by £360. The requested amount of the developer contributions in this application would be **£34,560**. The financial contribution will help support the commissioning of a pre-project study and an identified project which can be funded in one of two ways

¹ According to table 6 of the Council's Infrastructure Funding Statement, CIL funding was spent in administration, neighbourhood and strategic CIL project (i.e., North Wokingham Distributor Road).

² The NHS Property Services Demand Assessment Tool sets out that a practice with more than 18,000 should have at least 1,250 square metres floorspace.

depending on the pre-project study; either a reconfiguration of the internal layout or an expansion to provide additional clinical space at the Practice to increase capacity.

In an absence of this financial contribution, the Practice would not have the capacity to accommodate any new patients from the proposed development. This is contrary to the Council's Core Strategy's objective related to the health and wellbeing of the borough's residents. Therefore, the requested contribution is necessary to make the development acceptable in planning terms and is directly related to the development. Furthermore, the financial contribution is calculated based on predicted population increase of the proposed development. Therefore, it is fairly and reasonably related in scale and kind to the development. The financial contribution fully complies with Section 122 of the Community Infrastructure Levy Regulations 2010 (as amended).

The financial contribution should be secured by a Section 106 planning obligation. The ICB would request 20% of the developer contributions to be made prior to the commencement of the development to allow the commissioning of the pre-project study.

Summary and Conclusion

In an absence of any meaningful mitigation to be secured in this planning application, the ICB would raise objection to the proposed development in this regard. However, the ICB would welcome a meeting with the developer to resolve this matter.

Please contact me if you have any questions related to the requested financial contribution. The ICB also requests to be consulted for any forthcoming Section 106 planning obligation discussion.

Yours sincerely,

Jeffrey Ng MRTPI
Senior Primary Care Estates Manager