

Case Officer
Wokingham Borough Council

Unipart House
Oxford
OX4 2PG

11 September 2024

Dear Mr Hindle,

Planning Ref.: 242067 - Land Between Lodge Road And Tape Lane, Hurst, RG10 0EG

Thanks for consulting the NHS Buckinghamshire, Oxfordshire & West 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 including GPs. The 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.

Primary healthcare estates including GP premises are funded through reimbursement of rents and business rates by the ICB based on the existing population data. 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. **The ICB however has no dedicated funding for any primary care estates development in their annual budgets.**

Funding towards primary care

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.

The financial contribution will go towards capital costs of primary healthcare provision resulting from an increase in population and additional demand on healthcare facilities. Given that there are no CIL contributions towards healthcare,

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).

any necessary mitigation to avoid an unacceptable impact on primary healthcare would need to be secured by a Section 106 agreement.

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 Tool. For a GP practice which has a patient list size over 12,000, a minimum of 1,000 square metres of GIA is required.

The site is within Phoenix Primary Care Network (PCN). The PCN comprises two main surgeries, including Loddon Vale Practice in Woodley and Twyford Surgery in Twyford. Twyford Surgery is the closest practice to the application site. The Surgery currently has a patient list size of 12,295 with 834 square metres gross internal area. It implies that the Surgery is already over-capacity and requires additional clinical space to accommodate any new patients from the proposed development.

Projected Population

For the development concerned, the ICB have derived the incremental patient yield as follows:

Proposed number of dwellings (A)	99
Projected average population per dwelling (B)	2.4 (using average ONS census population data)
Patient Yield (C) = (A)x (B)	237.6 (round up to 238)

Primary healthcare project

The ICB are proposing a project to reconfigure existing non-clinical space or to extend the premise within the Twyford Surgery. It bears emphasis that this is a specific, identified and costed project, which relates directly to the quantum of development on the development site. The Section 106 agreement would identify and secure the delivery of this specific project.

The requested financial contribution will support the commissioning of a pre-project study and an identified project which can be funded in one of two ways depending on a pre-project study, either a reconfiguration of the internal layout or an expansion to provide an additional clinical space at the existing health centre at Twyford.

The ICB has a standard formula to work out the amount of financial contribution based on the projected population increase and then multiplied by £360. The requested amount of the developer contributions in this application would be **£85,680**

In an absence of this financial contribution, the Surgery 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 projected 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 has requested a financial contribution of £64,800 in another application in the local area. Any identified project to increase the capacity of the Practice can be co-funded by both applications.

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.

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