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Dear Joanna,

**Appeal Reference: APP/X0360/W/25/3371069 - Land to the north of Reading Road, Arborfield (Planning Reference: 243099)**

This letter intends to supersede the representation made by the Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board on 16 December 2024.

**Role of the ICB**

Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board (ICB) 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 healthcare (i.e., GP services). BOB-ICB covers Buckinghamshire, Oxfordshire, and Berkshire West areas<sup>1</sup>, including 51 Primary Care Networks (PCNs) covering 157 GP practices in total. 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 facilities<sup>2</sup>. 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

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<sup>1</sup> Berkshire West area includes Reading, Wokingham, and West Berkshire

<sup>2</sup> 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).

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, 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 BOB-ICB, as a primary healthcare commissioner.

There is currently no GP facility in Arborfield. The closest GP Practices are Shinfield Health Centre and Shinfield Surgery. Shinfield Health Centre is operated by South Reading and Shinfield Medical Practice which has another premise in South Reading, while Shinfield Surgery is operated by Swallowfield Medical Practice, which also has another premise in Swallowfield. The following table sets out the number of registered patients and the current gross internal area of both Practices:

| PCN             | Practice                                            | Registered Patients<br>(as at April 2024) | Gross Internal Area (GIA)<br>(sqm) | GIA standard<br>(sqm) | GIA surplus / deficit |
|-----------------|-----------------------------------------------------|-------------------------------------------|------------------------------------|-----------------------|-----------------------|
| New Reading     | South Reading and Shinfield Group Medical Practice) | 11,019                                    | 561.8                              | 916                   | deficit               |
| Wokingham South | Swallowfield Medical Practice                       | 15,412                                    | 696.8                              | 1,000                 | deficit               |

While there is no national guidance in setting out the capacity of a GP practice, NHS England widely accepts "size and space standards", which set out the appropriate size of GP premises (gross internal area (GIA), square metres) in relation to the number of patients to be accommodated at the premises. The table above clearly shows that both Practices are already over-capacity and would not have sufficient clinical capacity to accommodate any new patients from the appeal site. .

The ICB recently commissioned a primary care needs assessment in Shinfield and surrounding areas. The report sets out that there is a potential to extend the existing Shinfield Health Centre to accommodate any new population in the surrounding area. The ICB is also working closely with Swallowfield Medical Practice to discuss the potential of expanding their premises due to the continuing housing growth in the area.

The ICB is also in discussions with Swallowfield Medical Practice to review their existing premises and to discuss any potential developments of their premises to support population growth in the area.

#### Predicted population increase

This outline planning application is seeking to deliver up to 111 residential units to the 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 267 (rounded up) increase in population in the area.

#### Primary Care Estates Project

The requested financial contribution can either go towards the potential extension project of Shinfield Medical Centre of South Reading and Shinfield Group Medical Practice or to a proposed project to either reconfigure the existing non-clinical space or to extend the premise of Swallowfield Medical Practice. **It bears emphasis that both projects are specific, identified and costed, which relate directly to the quantum of development on the appeal site.** The Section 106 agreement would identify and secure the delivery of the identified project.

The requested financial contribution will support the commissioning of a detailed 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 Finchampstead

The ICB has a standard formula to work out the amount of financial contribution based on the projected population increase as below. This formula is adopted by the former Oxfordshire Clinical Commissioning Group (OCCG), which is now part of the ICB, as advised by NHS Property Services in 2017 including the formula and the £360 multiplier:

|                                               |
|-----------------------------------------------|
| Proposed number of dwellings (A)              |
| Projected average population per dwelling (B) |
| Patient Yield (C) = (A) x (B)                 |
| Multiplier (D) = £360                         |
| Contribution sought = (C) x (D)               |

#### Section 106 Planning Obligation

Given that it is an outline planning application, the final number of dwellings is unknown at this stage. The ICB is happy to consider the NHS's standard formula to be included in the draft Section 106 planning obligation to work out the actual amount of the developer contributions. The contribution would also need to be made **prior to any commencement of the development so as to allow the commissioning of the pre-project study and the delivery of an identified project.** The ICB would also like to request some flexibility in terms of allocating the developer contributions so that the contributions can be reallocated to other

identified projects in the local area to serve the development if the pre-project study identifies that the Practice is not suitable to have any further expansion, or the identified project is not operationally and financially viable. The requested contribution should be index-linked.

In an absence of this financial contribution, none of the Practices in the local area would not have the capacity to accommodate any new patients from the appeal scheme. 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).

### Other Appeal Decisions

The ICB would like to draw the Council's attention to an appeal decision<sup>3</sup> at the land to the North of the A4, New Bath Road, Twyford in Wokingham Borough. Paragraph 51 of the appeal decision relates to a healthcare contribution request from the ICB. The Inspector agreed that the request would meet the necessary test as the ICB has demonstrated that *the existing Twyford Surgery is over capacity and requires additional clinical space to be able to accommodate any new patients from the proposed development. This would be achieved through either the reconfiguration of existing non clinical space or an extension to the premises. The contribution has been calculated based on the number of dwellings proposed which has been used to define an additional patient yield.*

The ICB has a recent appeal decision<sup>4</sup> at the land adjacent to Blagrove Lane, Wokingham in Wokingham Borough. Paragraph 70 of the appeal decision relates to a healthcare contribution request from the ICB. The Inspector agreed that the request would meet the necessary test and has had regard to the approaches adopted by the Inspector in the New Bath Road appeal.

The ICB also has an appeal decision<sup>5</sup> at land at Churchway, Haddenham, Buckinghamshire. Paragraphs 19 to 22 of the appeal decision relate to a health contribution request from the ICB. The Inspector accepted the ICB confirmation that there is no capital funding budget for primary care infrastructure development. The Inspector also took into account an appeal decision at Warwickshire but confirmed that this did not apply as the appeal at Haddenham identifies the contribution for an identified primary care estates project including the commissioning of a pre-project study and an identified project which can be funded in one of two ways depending on

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<sup>3</sup> Appeal Ref.: APP/X0360/W/24/3350170

<sup>4</sup> Appeal Ref.: APP/X0360/W/24/3354667

<sup>5</sup> Appeal Ref.: APP/J0405/W/24/3339126

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

### Summary and Conclusion

Please contact me if you have any questions related to the requested financial contribution.

Yours sincerely,

*Jeffrey Ng*

**Jeffrey Ng MRTPI**

Primary Care Lead – Estates

NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board

