

Nick Chancellor
Development Delivery Manager
Wokingham Borough Council

Unipart House
Oxford
OX4 2PG

11 February 2025

Dear Mr Chancellor,

**Planning Ref.: 242653 - Hogwood Farm, Sheerlands Road, Arborfield,
Wokingham**

Thanks for your email dated 06 February 2025 regarding a letter from the applicant dated 3 February 2025 to the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (ICB). This letter should be read in conjunction with our representation dated 14 January 2025.

Arborfield Green Onsite Healthcare Provision

It appears that the applicant has some misunderstanding of the matter. The ICB has been engaged by the Council to discuss the possibility of having an onsite health provision at Arborfield Green Community Centre. However, it is understood that this is still a very preliminary discussion and does not involve any detailed discussion including how the provision will be delivered and the potential GP provider. **If the applicant would like to have more details about this provision, the ICB would advise the applicant to contact the Council or Crest Nicholson (the developer of the Community Centre) for more details.** However, the ICB considers that this provision would not be appropriate to be considered as a mitigation in this application.

The ICB acknowledges the former Clinical Commissioning Group (CCG) did not accept an onsite health provision in the planning application for 3,500 homes at Arborfield Green and it is not uncommon. Given that the role of the former CCG/ICB as a primary care commissioner, there is a delegated responsibility to find a GP provider to operate any new facility to be delivered and the facility is financially and operationally viable to both the nominated GP provider and the ICB. **Any facility which does not meet the requirements would not be accepted by the former CCG/ICB. This principle remains unchanged regardless of the former CCG or the ICB.**

Furthermore, the ICB does not consider that the non-acceptance of the health provision at that time is relevant to this planning application as the ICB is asking for an appropriate mitigation to be secured as the ICB has demonstrated that the GP

practices in the local area would not have the capacity to absorb the new population generated from the proposed development. Also, the current planning application is only seeking to deliver 48 residential units to the site, which is substantially below the threshold to deliver an onsite healthcare provision.

Funding towards primary care

The ICB acknowledges the points raised by the applicant regarding Community Infrastructure Levy (CIL). One of the key challenges of the ICB in applying CIL funding is that there is a lack of dedicated funding towards primary care estates including the commissioning of any pre-project works. This implies that the ICB would need to seek developer contributions to commission this or at the GP's own expenses. **The ICB's preferred option is to have a dedicated CIL funding allocation towards primary care but this was rejected by the Council and the Council also confirms that there is no other CIL fundings available to support primary care projects.** Therefore, S106 agreement is the only feasible option for the ICB to secure contributions towards healthcare. The ICB is happy to remove the contribution request in this planning application if the Council can confirm the CIL fundings towards primary care.

Local GP Capacity

The ICB agrees that it is not the applicant's responsibility to resolve the existing capacity issue. The only reason why the ICB would need to set out the existing capacity issue is to demonstrate there is no additional clinical capacity to accommodate any new patients from the proposed development. The applicant also mentions Finchampstead Practice. The following table is the existing patient list size of the Practice and its size:

PCN	Practice	Registered Patients	Gross Internal Area (GIA) (sqm)	GIA standard (sqm)	GIA surplus / deficit
Wokingham South	Finchampstead Practice	17,800	639.7	1,167	deficit

This comes to the same conclusion of Swallowfield Medical Practice that the Practice is already over-capacity and would not be able to accommodate any new patients from the proposed development. To summarise, the requested contribution is calculated based on the projected population generated from the proposed development and therefore it is in line with the scale and is directly related to the proposed development.

Primary Care Project

The applicant also raised a concern regarding the closest Practice to the application site as it should be Finchampstead Practice instead of Swallowfield Medical Practice.

In response to the closest Practice to the application site, the practices' catchment areas would be a vital factor to be considered instead of the distance, and it is common that practices' catchment areas overlap each other. The ICB would like to point that both Practices are within the same Primary Care Network (PCN) and the application site is within both Practice's catchment area. It implies that new patients from the proposed development can register in both Practices.

Also, the applicant also queried whether the identified Arborfield Surgery site would have the project to be delivered. The ICB acknowledges that the nature of the existing Arborfield Surgery, which is currently operated by Swallowfield Medical Practice. The ICB would like to apologise if there is any confusion caused by our representation dated 14 January 2025. The ICB is currently in discussions with the relevant Practice to review their premises including the Arborfield site and there is no identified solution. Any developer contributions to be secured in this planning application can go towards any forthcoming identified project.

The ICB also notes that the applicant would not agree to any S106 wording which would allow any contribution secured to be used for another primary healthcare project. The ICB considers that it is not reasonable. Firstly, it is the ICB, as a primary care commissioner, to determine and allocate the contribution to a deliverable project. The planning obligation can have such wording to be secured to ensure the contribution can only go towards a project which serve the development. This flexibility allows the ICB to redistribute the monies to another project if the identified one is not deliverable. The S106 would restrict the use of the developer contributions can only support an identified project which serve the development, and this is to ensure the use of the contributions meet all the tests set out under the Section 122 of the CIL Regulations (Reg. 122 test).

Summary and Conclusion

The ICB would like to draw the applicant's attention to a very recent appeal decision at Land to the North of the A4, Twyford (APP/X0360/W/24/3350170). Though this site is not in the vicinity of the application site, this site falls within the administrative boundary of Wokingham Borough, where the Council does not have a dedicated local plan policy or supplementary planning document related to healthcare. Paragraph 51 of the appeal decision is related to healthcare, as follows:

The contribution has been calculated based on the number of dwellings proposed which has been used to define an additional patient yield. Taking into account the representations made, as well as the approach adopted by the Inspector in the case of the Haddenham appeal, I am satisfied that this obligation would meet the necessary tests.

In an absence of this financial contribution, none of the GP Practices in the local area would 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).

I believe that this letter has responded to all the queries raised by the applicant, and it can be concluded that the ICB's contribution request complies with the Reg.122 test.

Our objection to the proposed development remains unless the requested contribution is secured in any forthcoming planning obligation of this planning application.

Yours sincerely,

Jeffrey Ng MRTPI

Primary Care Lead - Estates

Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board



RTPI
Chartered Town Planner

