

Sent on behalf of Sarah Webster, Executive Director for Berkshire West Place and Dr Abid Irfan, Directory of Primary Care and Deputy CMO

NHS Buckinghamshire Oxfordshire and Berkshire West Integrated Care Board (BOB ICB) has the following comments to make in respect of the West Berkshire Local Plan 2022 – 2039 Proposed Submission.

- BOB ICB notes that the proposed new Local Plan in effect provides for an additional 1809 housing units (once the 2,652 outstanding units in the 2006 – 2026 Local Plan, the 721 units not being retained in the Local Plan Review, the 1958 non-allocated sites, the 1949 units from the windfall allowance and the 57 C2 units are taken into consideration).
- We also note that of those 1809 housing units, 1500 are presumed to be at a North East Thatcham site and that for that site (Policy SP17) the draft states that ***“450 sq m of GP surgery is to be offered to BOB ICB or such appropriate body”***.
- BOB ICB has limited powers to own real estate and would consider that the draft plan does not make it all clear whether the “offer” is a fully operational and functional primary care facility at nil cost to BOB ICB or whether this is an offer subject to the payment of rent. There is also no mention of how big the site would be nor whether any surfaced car park would be provided for the facility, and if so, how large.
- If the latter, the ICB would consider that to be unacceptable. If the former, this is encouraging, albeit still not what the local GP Practices believe they can consider sustainable as such a small branch surgery would be too small to operate effectively.
- The ICB recognises that its requirement for new health infrastructure must comply with the requirements of Regulation 122 of the CIL Regulations 2010. A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—
 - (a) necessary to make the development acceptable in planning terms;
 - (b) directly related to the development; and
 - (c) fairly and reasonably related in scale and kind to the development.
- Recognising that the ICB cannot require any mitigation that is not related in scale to this NE Thatcham development, the ICB agrees with the Thatcham local practices, that a better mitigation of the extra demand from this NE Thatcham housing development, subject to Commissioner finance being available to fund the balance of the development, is a GP premises development that is significantly larger than that proposed, in order that it is a sustainable primary care facility.
- This facility is proposed to be a minimum of 1,000 sq m in Gross Internal Floor Area (on 2 floors) but that the housing development should only contribute to this health infrastructure as follows:
 - The donation of a freehold serviced site with good vehicular and bus access at nil cost sufficient in size to accommodate a Primary Care facility of a minimum size of 1,000 sq m (and sufficiently large enough i.e. **a rectangular site with a minimum area of 0.8 Ac**, to accommodate reasonable car parking and landscaping facilities for such a development) and
 - A capital contributionSuch that the combined financial contribution is equivalent to that currently envisaged in the Local Plan Review.

- The ICB has evidence for other new health centre developments, leading it to believe that the 450 sq m facility, as currently described in the Local Plan review would currently cost approximately **£3 M** to build (including fees, VAT, finance, GP IT infrastructure, furnishings and land purchase).
- BOB ICB considers that this alternative mitigation would provide the necessary GP resilience needed as a result of the additional demand created by this proposed NE Thatcham development, as well as allowing one of the local GP Practices to re-locate to the NE Thatcham site, from its existing premises.
- The ICB would therefore wishes to see the West Berks Local Plan review reflect the ICB's requirements as stated above, that a serviced, well-accessed rectangular site of minimum area 0.8 Ac be donated by the developer to the ICB or its nominee, and that this site (being independently valued by an appropriate Chartered Valuer) be part of the £3M developer contribution.
- THE ICB would also like to comment regarding Policy SP 14 (Sites allocated for residential development in the Eastern Area). it is noted that 200 new housing units will be provided in Theale (RSA 9,10 and 11) and that there are also 35 Housing units to be provided in Calcot (RSA 8) and 35 in Purley (RSA 7). It is further noted that in the current (2016) iteration of the West Berkshire IDP, that within the table on page 60, ***“Improvements to GP premises in area of development. Approx additional 50 sq.m”*** are described as being required to mitigate housing growth at ***“Tilehurst, Calcot, Purley, Theale”***. This Table indicates that this 50 sq m is a collective total of new floor space that should be paid for by developer contributions at a cost of £150,000. The ICB's view is that the 50 sq m currently articulated should be described as a net (as opposed to gross) floor area. Furthermore, as 50 sq m net space would cost around £350k to build as at Q1 2023 prices, not £150k as stated. The ICB considers that if developer contributions were sought that amount to £350k, this would be sufficient for the local GP Practices to deal with the additional capacity, either through 50 sq m of additional space, or through the provision of internal modifications to create additional clinical/patient-facing space.
- Policy SP15 (Sites allocated for residential development in North Wessex Downs AONB) states inter alia that 140 units will be provided at Compton (HAS 23), 60 at Lambourn (HAS 19) and 49 at Hermitage (HAS 24 and RSA 22). It is further noted that in the current (2016) iteration of the West Berkshire IDP, that within the table on page 60, ***“Improvements to GP premises in area of development. Approx additional 50 sq.m”*** are described as being required to mitigate housing growth at ***“AONB (Hungerford, Lambourn, Pangbourne)”***. This Table indicates that this 50 sq m is a collective total of new floor space that should be paid for by developer contributions at a cost of £150,000. The ICB's view is that the 50 sq m currently articulated should be described as a net (as opposed to gross) floor area. Furthermore, as 50 sq m net space would cost around £350k to build as at Q1 2023 prices, not £150k as stated. The ICB considers that if developer contributions were sought that amount to £350k, this would be sufficient for the local GP Practices to deal with the additional capacity, either through 50 sq m of additional space, or through the provision of internal modifications to create additional clinical/patient-facing space.
- The ICB notes that regarding Sandleford (SP16) consisting of 1.500 proposed housing units, that on page 55 of the Supplementary Planning Document for this site, it states that “Health care facilities to serve the site, likely to be through the extension of Falkland Surgery” but no details are given.
- It is further understood that there may be a Section 106 Agreement in existence for this Sandleford housing site which provides for £512,625 for health mitigation in the form of an extension at Falkland Surgery/68.35 % of the cost of such an extension (Bryan Little email to Helen Clark of 10 February 2023 refers). As the assumption from this is that such an extension would then in total only cost £750,000 (including VAT, fees and finance), the ICB

wishes it to be known that the extension that Falkland Surgery now to mitigate such a large housing development is estimated to cost around **£1.25 M** including VAT, and that consequently, if at all possible, the Local Plan Review and the amount of developer contributions required by the ICB for this 1,500 housing unit proposed development at Sandford should be increased to reflect these more accurate cost estimated. A failure to reflect up to date cost estimates (given that we understand the £750k estimate dates back to 2014) will mean that the proposed extension will become unaffordable to the NHS.

- The ICB note that there are also 100 housing units planned in Burghfield (RSA 22) – part of the Local Plan Review SP14. It is further noted that the mitigation for this is described in the IDP as “Improvements to GP premises in area of development. Approx additional 25 sq.m” at a cost of £75,000. The ICB’s view is that the 25 sq m currently articulated should be described as a net (as opposed to gross) floor area. Furthermore, as 25 sq m net space would cost around £175k to build as at Q1 2023 prices, not £75k as stated. The ICB considers that if developer contributions were sought that amount to £175k, this would be sufficient for the local GP Practices to deal with the additional capacity, either through 25 sq m of additional space, or through the provision of internal modifications to create additional clinical/patient-facing space.
- The ICB would welcome an opportunity to discuss being a recipient of Community Infrastructure Levy (CIL) contributions towards Primary Care developments with West Berks Council.
- Finally, the ICB would welcome an opportunity, as part of the Local Plan review, to revise the IDP so that a better understanding of up-to-date primary care development costs can be incorporated into subsequent section 106 Agreements, particularly if Section 106 and CIL developer contributions are replaced by the proposed “Infrastructure Levy” as part of National Government’s levelling up Agenda.