



Buckinghamshire, Oxfordshire
and Berkshire West
Integrated Care Board

Anthony Scholes
Principal Planning Officer
Planning Section | Directorate of Economic
Growth and Neighbourhood Services
Reading Borough Council

Unipart House
Oxford
OX4 2PG

15 July 2025

Dear Mr Scholes,

PL/24/1155 – Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 215 build to rent residential dwellings (Use Class C3) together with flexible commercial / community space (Use Class E/F1/F2), residents' facilities, landscaping, public realm, amenity space, cycle parking and disabled car parking.

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. This letter is seeking to supersede our original representation letter dated 16 May 2025.

Funding towards primary care estates

Primary care 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 has no dedicated funding for any primary care estates development in their annual budgets.**

Reading Borough Council (the Council) has implemented Community Infrastructure Levy (CIL) but there is currently no CIL contribution towards primary care. According to the Council's Infrastructure Funding Statement 2023-2024, page 6 of the Statement sets out a table showing how CIL was spent between 2023-2024 and health has nil spending. **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.** Any developer contribution to be secured in this planning application will go towards capital costs of providing primary care mitigations resulting from an increase in population and additional demand on primary care facilities.

Proposed development

It is understood that the proposed development will deliver up to 170 new residential units, including a wide range of 1-, 2- and 3-bed units. Although the proposed development comprises a wide range of health and wellbeing facilities, there is no mitigation provided towards primary care.

Local GP Capacity and Primary Care Mitigation

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 site is in Central Reading, and it is within the catchment areas of a number of Practices. The following table sets out the number of registered patients and the current gross internal area of both Practices:

PCN	Practice	Registered Patients	Gross Internal Area (GIA) (sqm)	GIA standard (sqm)	GIA surplus / deficit
Reading Holybrook	Reading Walk-in Health Centre	14,271	709.58	1,083	deficit
Reading Central	London Street Surgery	5,753	236.9	500	deficit
Reading Central	Pembroke Surgery	6,193	509.6	667	deficit
New Reading	Melrose Surgery	14,695	494.3	1,083	deficit

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. **The table above implies that none of the GP Practices in the local area would have the capacity to accommodate new patients generated from the proposed development.**

The ICB has managed to secure a retail unit next to the existing Reading Walk-in Health Centre for a new primary care facility and a developer contribution to support the project. This would also provide additional capacity/ However, it is important to note that the secured developer contribution would not be adequate to support the project cost to convert this retail unit to a primary care facility. Therefore, additional funding would be required.

The requested financial contribution in this proposed development would help support this new primary facility. It bears emphasis that this is a specific and identified project. The ICB has a standard formula to work out the amount of financial contribution based on the projected population of the proposed development. 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) = 2.4 (ONS Average occupancy rate)
Patient Yield (C) = (A) x (B)
Multiplier (D) = £360
Contribution sought = (C) x (D)

The ICB would request a financial contribution of **£146,880** towards primary care. The contribution request is directly related to the quantum of the proposed development. The contribution will go towards the ICB's funding pot of this new primary care facility so as to provide additional capacity to accommodate new patients from the proposed development. The ICB would request the contribution to be made prior to the commencement of the proposed development if permitted and the contribution should be index-linked.

Regulation 122 Test

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). It is noted that the proposed GP facility at Broad Street Mall catchment includes the application site and new residents are allowed to register their GP in this proposed facility.

Other Appeal Decisions

The ICB would like to draw the Council's attention to a recent appeal decision¹ at the land to the North of the A4, New Bath Road, Twyford in Wokingham Borough Council, Paragraph 51 of the appeal decision relates to a healthcare contribution request from the ICB. The Inspector at the Twyford appeal 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*

¹ Appeal Ref.: APP/X0360/W/24/3350170

number of dwellings proposed which has been used to define an additional patient yield.

The ICB also has a recent appeal decision² 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.

Summary and Conclusion

In an absence of an appropriate healthcare mitigation to be secured in this planning application, the ICB would like to raise **OBJECTION** to the proposed development but would welcome a meeting with the applicant to discuss the proposed mitigation.

Thanks again for consulting the ICB in this planning application. Please do not hesitate to contact me if you have any questions about this letter.

Yours sincerely,

Jeffrey Ng

Jeffrey Ng MRTPI

Primary Care Lead – Estates

NHS Buckinghamshire, Oxfordshire & West Berkshire Integrated Care Board



RTPI
Chartered Town Planner



² Appeal Ref.: APP/X0360/W/24/3354667