NHS
Coventry and Warwickshire
Integrated Care Board

Coventry and Warwickshire Integrated Care Board Health Response Application Reference: R24/0111– Land North of Rounds Gardens, Rugby

Comments have been prepared by NHS Coventry and Warwickshire Integrated Care Board (the ICB) in response to the development of 115 dwellings at land North of Rounds Gardens, Rugby.

Context

It is increasingly recognised, in England and further afield, that local council's development plans and policies can have important long-term effects on physical and mental health and wellbeing of their areas population. It is also important for reducing inequalities in health. The 2019 National Planning Policy Framework (NPPF) places a stronger emphasis on these links than previous iterations. The NPPF sets out three overarching objectives that the planning system should abide by to achieve sustainable development. These are economic, social and environmental.

Paragraph 2 of the NPPF states that applications for planning permission must be determined in accordance with local plans unless material considerations indicate otherwise, and paragraph 38 states that planning authorities should approach decisions on proposed development in a *positive and creative way* and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Planning policies and decisions should aim to achieve healthy, inclusive and safe places and enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs (paragraph 91 of the NPPF).

In addition to this, paragraph 92 states that Local Councils are to "plan positively for the provision...of…community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments" and are to *"take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community".* This includes the ICB's Estate Strategy.

Primary Care

In line with CIL compliancy, the ICB wishes to make a request related to the funding of health requirements through a planning obligation under S106 of the 1990 Act, which in order to be "CIL compliant" must meet the tests of specified in Regulation 122(2) of the Community Infrastructure Level (CIL) Regulations 2010. Those tests require that the sums are –

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

The commentary below explains how each of these tests has been met.

NHS Coventry and Warwickshire ICB estimates that the development of up to 115 dwellings at the land North Rounds Gardens, Rugby will generate a total of 276 residents using the ratio of 2.4 residents per dwelling.

Our analysis of primary care facilities in the locality shows that there are a number of practices providing primary care medical services to the area. The practices have been identified where they are within a 1.5km radius of the location shown in Figure 1 below and listed below:

Name of Practice	**Address**
Central Surgery	Corporation St, Rugby CV21 3SP
Market Quarter Medical Practice	Drover Close, Rugby CV21 3HX
Beech Tree Medical Practice	Drover Close, Rugby CV21 3HX
Whitehall Medical Practice	Morton Gardens, Rugby CV21 3AQ
Clifton Road Surgery	26 Clifton Rd, Rugby CV21 3QF
Bennfield Surgery	Hilton House, Corporation Street, Rugby CV21 2DN
Westside Medical Centre	Hilton House, Corporation Street, Rugby CV21 2DN

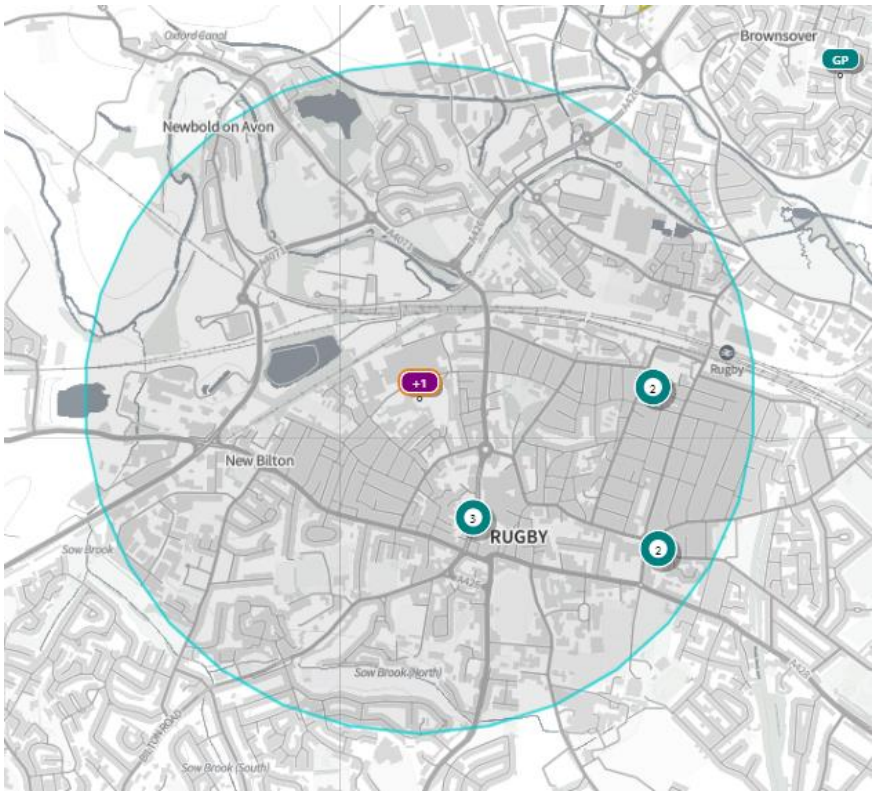

Figure 1: GP Practices closest to the development (Source: SHAPE)

We have looked at the capacity of the practices and based on current list size, our space estimator indicates a requirement for 93 clinical rooms; however, the practices currently operate from 95 clinical rooms and are therefore almost at capacity for their list sizes and there will be a capacity shortfall of 6 clinical rooms by 2034 (Source: NHSE PID estimator).

A summary of the analysis of the local practice position is shown below in Figure 2.

Year	List size (all practices)	NHSE PID Estimator Clinical Rooms		
		Consulting Rooms	Treatment Rooms	Total
2024	87826	70	23	93
2034	95254	76	25	101

*Includes population growth and housing development population growth to 2031

Figure 2: NHSE PID Estimator Clinical Rooms Assessment

Therefore, in order to support the additional growth anticipated from the proposed housing development, the ICB requests s106 developer contributions for infrastructure to support the development. Having modelled the future housing growth and our future health delivery services via Primary Care Networks including an extended workforce we know the implications on the estate footprint for those practices shown in figure 1 will not be sufficient to meet the future population requirements. The ICB needs to ensure future delivery of primary care services and has to consider more integrated service delivery models for health and wellbeing provision of the local population. This may be by way of a new build facility or improvement works for the primary care and healthcare estate within Rugby PCN.

Further analysis has been completed using NHSE and ICB modelling tools to calculate the space and associated financial requirements to deliver the primary care provision required to meet the specific population growth needs from this planning application. This is shown is below.

The capacity and cost analysis below demonstrate how this request is **directly related to this development** and **fairly and reasonably related in scale and kind to the development.**

Capacity Analysis	115 dwellings
Planned number of dwellings	115
Forecast increase in population	276
Average no. of consultations per annum	6
Forecast no. of consultations per annum	1656
Clinical floor area required GIA m2	6
Clinical / non clinical support GIA m2	11
Circulation / engineering / planning allowance GIA m2	11
TOTAL GIAm^2	**28**

Cost Analysis	Net Cost	Gross Cost
Construction Cost	£117,600	£141,120
Abnormal Site Works	£23,520	£28,224
Sub Total Work Costs	£141,120	£169,344
Equipment	£14,112	£16,935
Fees	£27,942	£27,942
Statutory Charges	£7,056	£8,467
Sub Total Non-Works Costs	£49,110	£53,344
Total Works & Non-Works Costs	£190,230	£222,687
Risk Contingency Allowance	£22,828	£27,393
Total Cost	**£213,057**	**£250,080**

Figure 3: Cost Analysis for new build on development site (Source NHSE PID and Cost Estimator- Version April 2017)

The capital contribution required is currently estimated at £250,080 to be allocated as part of this application for the improvement and/or extension and/or replacement of primary medical care facilities in the Rugby Primary Care Network.

The costs presented need to be index linked.

Consideration would need to be given to the phasing of the development and the trigger point at will need to be in place. This will need to be discussed with the ICB and NHS England.

Further detailed planning work will also establish a more detailed development cost and how any shortfall in funding could be found through other routes (if required). These funding routes could be through other private investment or NHS England linked grants. However, as the increase in patients is directly due to this planning application, we are seeking funding to the Primary Care development equal to the proportion of additional patients this application/development could create.

The potential impact if contributions are not made is that a new primary care facility will not be completed to serve the new population, and local practices will reach maximum capacity and be forced to close their lists to new patients. In this case, the new population arising from this development will experience issues gaining access to primary medical care services.

The ICB welcomes the opportunity to discuss this request further with the case officer and/or applicant and wish to be involved throughout the S106 wording process to ensure that contributions are allocated in the most appropriate way.

Prepared by Coventry & Warwickshire Integrated Care Board
12th August 2024 – updated to reflect change to number of dwellings