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Monday 19th May 2025

Dear Colleague,

**Rugby Borough Council Local Plan review Preferred Options Consultation Response –
Coventry and Warwickshire ICB – Primary Care.**

I write on behalf of NHS Coventry and Warwickshire Integrated Care Board (ICB) in response to the publication of the Local Plan review Preferred Options consultation (hereafter referred to as the Local Plan Preferred Options 2025). The ICB is grateful for the opportunity to provide comments. Its focus in doing so is to ensure that primary medical care (General Practice) infrastructure is adequately provided for within the Section 106 framework/Community Infrastructure Levy and that funding of future primary medical care provision and access is not compromised through housing development and population growth.

The NHS Long Term Plan has set a clear future direction of travel for the NHS in England and building on the national strategic aims outlined within Five Year Forward View. The General Practice Forward View places strong emphasis on the need to expand and strengthen primary and wider out-of-hospital care. More recently, the Fuller Stocktake underscored the necessity of integrating primary care with broader community services to facilitate a shift towards proactive, personalised care models and the Darzi Report, “High Quality Care for All”, emphasised the imperative of quality improvement and patient-centred service delivery. NHS England is currently co-producing a ten-year health plan, which drives a transformative agenda centred on three big shifts: moving health and care from hospital to the community, digitising services, and emphasising prevention. As such, developments (including community and health infrastructure) that support innovations in patient care, increased use of technology and integration of health, wellbeing and wider community services to develop community wellbeing and cohesion, is a key consideration for when and where development is planned to be delivered in the local area.

The ICB has reviewed and considered the preferred options and there are a number of key health and care messages that need to be considered against the site selection:

The ICB is supportive of the plan consultation six main objectives:

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1. Support the diversification and growth in sustainable locations of Rugby Borough's economy in line with the Economic Strategy
2. Support the revival of Rugby town centre
3. Reduce emissions and adapt to climate change
4. Raise design standards
5. Deliver infrastructure-led growth
6. Facilitate a greener, more biodiverse borough and deliver new country parks

Strategy for homes and residential allocations (Policies S2 and S6)

As the Borough Council will already be aware, the population arising from any new housing will place increased demand upon healthcare services within the Borough, including primary medical care services provided by the Borough's GP practices. There are already existing capacity constraints within primary care delivery sites across Rugby and any growth areas must prioritise the development and improvement of primary care infrastructure to meet the health needs of the local population via S106 and CIL funding. The ICB welcomes discussions around the sizing of growth sites to ensure they support viable and sustainable delivery site for primary care services.

The ICB expresses concern regarding the potential overwhelming impact of dispersed small-scale developments on primary care already operating at capacity. A fragmented approach could overwhelm existing PC sites and create challenges in securing adequate developer contributions for infrastructure expansion. The ICB recommends exploring strategies to cluster small-scale developments around existing settlements to achieve economies of scale and facilitate sustainable growth in the primary care infrastructure.

A dispersed approach without sufficient scale can result in the new local population facing additional challenges in accessing services and increased travel requirements, noting that transport links in rural areas are often less frequent and inaccessible

Larger growth areas of sufficient size to enable a viable Primary Care delivery site also can enable development of community facilities such as local shops, meeting place/village halls, which are important for promoting healthy and inclusive facilities. The ICB is supportive of the provision of shared spaces and community facilities, recognising their role in fostering community cohesion, offering opportunities for diverse groups of people to socialise, and access to healthcare information and services. The ICB is keen to work with the Borough Council and local partners to progress the delivery of community hubs to respond to population growth areas.

Policy S6 - Comments on preferred sites

Policy S6 details the proposals on delivering small site housing options in the rural locations. As detailed earlier small site development can create challenges for current Primary Care delivery sites, as the space required to support the new population may not be viable on the site i.e. the site may not be able to expand, and the growth may not be sufficient to warrant a new delivery site. Of particular concern is:

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Wolvey – this practice is a branch site of a GP Practice which is outside our local area, in Hinkley, and noting the rurality of the area and transport links, access to services for the new population in this area would need further discussion, as there may be wider service viability issues beyond Primary Care.

Dunchurch – this practice does not have any further expansion opportunities on site. The practice has already been impacted by local growth and is the nearest practice to the SW Rugby growth area. The ICB would request that any growth in this area is located where the new population could access services on the SW Rugby growth area, noting via S106 the ICB has requested land and capital to support a new delivery site for the new population.

Wolston – this practice is in a rural location, with very limited expansion opportunities. The housing numbers are small, but the ICB notes there is a suggestion that the housing could be specialist older persons housing which is a concern, noting the wider health and social care needs of these residents, and the criticality of ensuring they have good physical access to those services. The ICB requests that the Borough Council considers the health needs and wider health and social care service access/delivery points where specialist housing is being implemented.

Review of the other sites indicates the growth could be accommodated, subject to S106 funding to support reconfiguration and/or expansion of practices whose catchment areas cover the site and are geographically close to the development sites.

There is potential for growth particularly where a new GP practice is being planned, for example, near Houlton or SW Rugby, noting that the space can only be delivered through additional S106 funding related to the additional population growth from housing.

Climate. Policies CL 1-4

The ICB supports policies CL 1-4, recognising the critical role of the planning system in addressing climate change and promoting sustainable development. The ICB is working to the NHS Green Plan and infrastructure contributions need to incorporate the costs of implementing sustainable practices for both existing and new primary care delivery sites in order to ensure infrastructure can mitigate the challenges of climate change while delivering high-quality healthcare.

Economy. Policies E1-3

The ICB supports these policies on the basis that a strong economic economy has a positive health and wellbeing benefit for the local population. Developing local communities with infrastructure requirements factoring in economic elements, recognising the benefit for health and wellbeing for our population through housing, community development, infrastructure and economic development.

Centres. Policies C1-4

The ICB welcomes the Borough's priorities with the town centre, district centres and neighbourhood hubs.

As mentioned earlier community facilities such as local shops, meeting place/village halls, medical facilities, sports venues, pubs, and places of worship are important for promoting healthy and inclusive facilities. The ICB is supportive of the provision of shared spaces and community facilities, recognising their role in fostering community cohesion, offering opportunities for diverse groups of people to socialise, and access to healthcare information and services. The ICB is keen to work with

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the Borough Council and local partners to progress the delivery of neighbourhood hubs to respond to population growth areas.

Environment. Policies EN1-8

The ICB agrees that a healthy natural environment is of vital importance to people, places, the economy and nature itself. It provides important services such as food, fresh water, clean air, and much more. In particular the ICB is supportive of

- Policy EN7 EN8 Covering addressing impacts from pollution and improving air quality, both have significant impacts on the health of our population
- draft Policy Direction 44, recognising the importance of outdoor sports and leisure in promoting physical and mental well-being.

Housing. Policies H1-8

The ICB is supportive of the policy direction that allow for new homes that meet the diverse needs of all residents, in particular affordable housing, older persons and specialist housing, Health and Care workforce is key to our future clinical and delivery model, recognising that these staff groups need access to housing that is affordable for those in lower paid jobs.

Wellbeing. Policy W1

As mentioned earlier community facilities such as local shops, meeting place/village halls, medical facilities, sports venues, pubs, and places of worship are important for promoting healthy and inclusive communities and associated wellbeing. The ICB is supportive of the retention and provision of shared spaces and community facilities, recognising their role in fostering community cohesion, offering opportunities for diverse groups of people to socialise, and access to healthcare information and services.

Design. Policies D1-5

The ICB is supportive of the policies

Infrastructure. Policies I1-6

The ICB is pleased that the Borough Council is committed to ensuring the provision of infrastructure alongside housing and employment growth. Sustainable transport is essential for enabling equitable access to outdoor spaces and healthcare services and is a key factor in reducing carbon emissions. The ICB highlights the importance of ensuring associated transport and technology infrastructure is in place to support access for all population groups.

Key Messages

- The ICB has a duty to ensure that primary medical care (General Practice) infrastructure is adequately provided for within the Section 106/Community Infrastructure Levy framework and that funding of future health provision and access is not compromised through housing development and population growth.
- Existing primary medical care capacity in Rugby will not be sufficient to meet the housing growth proposed in the modified Local Plan Preferred Options 2025.
- The ICB will require suitable provisions put in place and adequate allowances made in the Section 106 work being undertaken by the local Council.

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- A collaborative approach between the ICB, health and care partners, and the local Council will be needed in support of the above, having regard to the Integrated Care System's 10 year Infrastructure Strategy.
- The ICB would welcome the opportunity to engage further with the local council regarding what physical infrastructure projects/schemes will require support via Section 106 planning obligations.
- The ICB does not expect physical infrastructure (built space) to form the "whole solution" and wishes to explore what opportunities there are to support other means of delivering additional primary medical care capacity via Section 106 planning obligations.
- The ICB would request that the council gives full consideration to the need for good public transportation links to be in place to enable the population to access GP practice premises across the borough (including any new premises constructed during the Plan period).
- The ICB is mindful that broader issues affecting population health and wellbeing, including air pollution/quality and the availability of green spaces, are priorities. Recognising this, the ICB would strongly endorse the direction, including the use of Health Impact Assessments.
- The ICB will wish to work proactively with the Borough Council to help inform and develop any future *Health Impact Supplementary Planning Document*.
- The ICB would ask the local council to share as much information as possible with it at the earliest stage as regards the likely profile of the population arising from any planned housing development. This will assist the ICB's wider planning process by enabling it to understand the likely health needs of the population, as well as the preferred channels of communication of sub-groups within the population, which in turn, allows for more effective service development, delivery and population engagement.

I would, finally, like to thank you for giving the ICB the opportunity to comment on the Local Plan Preferred Options 2025. We trust that the above comments will be taken into consideration. If appropriate, we would be more than happy to have further discussions with the Borough Council or their appointed representatives.

