

Statement of Common Ground with NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board

This document addresses action number 9 and was raised at the Matter 2 hearing session:

Statement of Common Ground (SOCG) with NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB)

South Oxfordshire and Vale of White Horse Joint Local Plan 2041

Statement of Common Ground

Between

South Oxfordshire District Council,

Vale of White Horse District Council and

NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board

June 2025

1. Introduction

1.1. This Statement of Common Ground (SOCG) has been prepared by South Oxfordshire and Vale of White Horse District Councils (“the councils”) and Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (“BOB ICB”), hereafter referred to as “the parties”. This SOCG documents those matters agreed with regard to the South Oxfordshire and Vale of White Horse Joint Local Plan 2041 and supporting documents, to assist the Inspectors during the examination of the Joint Local Plan.

1.2. This SOCG relates to the following policies (in plan order):

- a) Policy SP3: The strategy for Didcot Garden Town
- b) Policy HOU1: Housing requirement
- c) Policy HOU5: Housing for older people
- d) Policy LS1: Proposals for large scale major development
- e) AS1 to AS10 and AS16, the residential-led site allocation policies in chapter 8 of the JLP and their associated entries within the Infrastructure Delivery Plan (IDP)
- f) Policy DE3: Delivering well-designed new development
- g) Policy HP1: Healthy place shaping
- h) Policy HP3: Health care provision
- i) Policy IN1: Infrastructure and service provision

2. Background / Context

- 2.1. In preparing the South Oxfordshire and Vale of White Horse Joint Local Plan 2041, the councils have run several periods of publicity on the plan, including the Issues Consultation (regulation 18), which ran from May to June 2022, the Preferred Options Consultation (regulation 18) from January to February 2024, and the Publication Stage (regulation 19) from October to November 2024. BOB ICB submitted representations to the Preferred Options consultation in February 2024. Following this consultation, the councils arranged a meeting with BOB ICB to discuss how the residential-led allocations within the plan could provide appropriate primary healthcare provision.
- 2.2. The councils and BOB ICB met on the 7 May 2024. Ahead of this meeting, officers shared a draft update of the IDP schedule, which was based on the IDPs for the adopted local plans. At the meeting, officers explained the approach to assessing infrastructure in the plan, and asked the ICB to provide their assessment of infrastructure needs following the meeting in writing. The ICB provided this on 15 May 2024 by providing direct commentary into the councils draft IDP document.
- 2.3. In response to the Publication Stage consultation, the ICB has also supported other policies in the plan, and raised objections to others, which are discussed and explained below.

3. Policy SP3: The strategy for Didcot Garden Town (disagreement)

- 3.1. The ICB supports the inclusion of the new GP facility at Great Western Park in the policy. However, they have raised an objection as they would like the policy wording to clarify that any new GP facility should be agreed with the ICB or other such appropriate body in order to be operationally and financially viable. They believe it also indicates the need for a dedicated Policy HP3 related to health care provision, and have suggested an alternative policy in their Regulation 19 response.
- 3.2. The councils don't believe this change is necessary to ensure the soundness of the plan, as this requirement would apply to most forms of infrastructure. It is an implicit part of testing whether appropriate mitigation measures can be implemented.

4. Policy HOU1: Housing requirement (agreement)

- 4.1. The parties agree that the housing requirement in Policy HOU1 is sound.

5. Policy HOU5: Housing for older people (disagreement)

- 5.1. The ICB believes that the policy or supporting text needs to be amended to require developers of specialist housing for older people to engage early with

the ICB, and to demonstrate that proposals would not have a material impact on local GP services. This kind of development, as discussed in the ICB's representation, will be expected to have a greater demand for primary care facilities. Therefore, it is important to ensure the ICB is engaged and agreed with any proposed mitigations to ensure any proposed mitigations are deliverable and viable. The ICB has suggested alternative policy wording for Policy HP3 in their Regulation 19 to address this point.

- 5.2. The councils don't believe this change is necessary to ensure the soundness of the plan. The councils believe that Policy IN1: Infrastructure and service provision sets an appropriate framework for securing infrastructure from new development, including those developments covered by Policies HOU5.

6. Policy LS1: Proposals for large scale major development (disagreement)

- 6.1. The ICB believes that the policy or supporting text needs to be amended to require developers to engage early with the ICB, undertake pre-project assessments and to include the pre-project assessment as part of the relevant technical studies and supporting documents set out in paragraph g of the Policy. The intention of paragraph g is to provide a list of documents to support any forthcoming applications. The pre-project assessment is a vital study to support any proposed mitigations of the development.
- 6.2. The councils don't believe this change is necessary to ensure the soundness of the plan. The councils believe that Policy IN1: Infrastructure and service provision sets an appropriate framework for securing infrastructure from new development.

7. Policy AS1 to AS10 and AS16: Site allocations (disagreement) and associated entries within the IDP (agreement)

- 7.1. The ICB believes that these site allocation policies need to be amended to include a specific criterion regarding primary health care provision. The ICB suggested proposed modifications to the policies in their regulation 19 representations including the insertion of primary care mitigations for each of the individual AS Policies.
- 7.2. The ICB has raised a concern regarding the deliverability of a "community hub" set out in Policy AS1. They suggest that there is an absence of details of how this "hub" to be delivered and a lack of implementation plan in achieving this. As explained in the ICB's representation, they believe that this detail is vital to ensure that the plan is "justified". Policy IN1 does not provide any information in terms of delivering a "community hub".
- 7.3. The councils don't believe this change is necessary to ensure the soundness of the plan. The councils believe that Policy AS1 doesn't require health provision to be delivered as part of a community hub but suggests that the community

hub “*may include new premises for an expanded health centre or alternatively premises for a new health centre provided within the new development*”. If the health centre cannot be provided as part of the community hub for the reasons that the ICB set out above, the policy would still expect the development to provide appropriate mitigation set out in the IDP.

- 7.4. Although it is challenging for the ICB to provide a list of detailed primary care projects, the parties agree that the IDP provides an appropriate and proportionate assessment of the primary health care needs and estimated costs of the residential-led allocations. The parties agree that, at planning application stage, the exact nature of health care mitigation could change to reflect the application being determined. This would take account of the capacity of nearby primary health care facilities at the time a Section 106 agreement is signed, as well as the exact bedroom mix / population profile of the application.

8. Policy DE3: Delivering well-designed new development (disagreement)

- 8.1. The ICB believes that the policy or supporting text needs to be amended, or the policy needs to be supported by a Supplementary Planning Document (SPD), to provide further technical advice on the colocation of community facilities and amenities. This is required because the plan should be effective and should be deliverable. The ICB, as one of the infrastructure providers, has the responsibility to ensure that colocation will be achieved and that its delivered in line with the primary care delivery model. In the absence of details or some context into how colocation is going to be delivered, they state that the plan fails to meet the soundness test of the plan.
- 8.2. The councils don't believe this change is necessary to ensure the soundness of the plan. Policy DE3 encourages design review panels for qualifying developments at the earliest stage, preferably prior to submission of a planning application – i.e. at pre-application advice stage. At these design panels, the supporting text at paragraph 10.17 confirms that they “*...provide an opportunity for additional independent and objective voices to be heard from a variety of expert professionals in the built environment industry, helping to identify any issues early on in the planning process and support urban design officers in their analysis and decision making.*” These “expert professionals in the built environment industry” would include representatives from BOB ICB as key infrastructure providers.

9. Policy HP1: Healthy place shaping (agreement)

- 9.1. The parties agree that the policy is sound.

10. Policy HP3: Health care provision (disagreement)

- 10.1. The ICB believes that the policy should be split into three parts to tackle the different strands of health care provision in the policy, and to provide additional clarity. The ICB set out proposed modifications to the policy in their regulation 19 representation. They suggest that the proposed modifications are important as it would clearly set out the differences of the two mitigation measures. While there is no implication to the use class, there is a significant implication to the ICB as a certain threshold is required to justify a new provision and the improvements and expansions of existing premises are always the ICB's preferred mitigation for any new developments.
- 10.2. The ICB state that the original wording concludes that both mitigations will be supported and there is no mention of the ICB, which is a statutory primary care commissioner. They say that this is contrary to the soundness of the plan in terms of it not being positively prepared or justified.
- 10.3. The Councils don't believe this change is necessary to ensure the soundness of the plan. These different types of healthcare provision will fall under the same use class, and so it wouldn't be possible to make such a change effectively.

11. Policy IN1: Infrastructure and service provision (agreement)

- 11.1. The parties agree that the policy is sound.

12. Conclusion

- 12.1. The parties agree that they have engaged effectively and on an on-going basis during the plan making process.
- 12.2. The parties agree that the IDP provides an appropriate and proportionate assessment of the primary health care needs and estimated costs of the residential-led allocations.
- 12.3. The parties disagree on whether additional wording is needed to confirm the role of the ICB in pre-application discussions, the need of primary care mitigations in each of the AS Policy and for clarity on the financial and operational sustainability of primary health care facilities.
- 12.4. The parties disagree on whether additional wording or an SPD is needed to set out details of colocation of community facilities including health care facilities.
- 12.5. The parties will continue to work jointly to ensure sufficient healthcare infrastructure is provided for through both the development management process, and in any future plan making.

Signatures

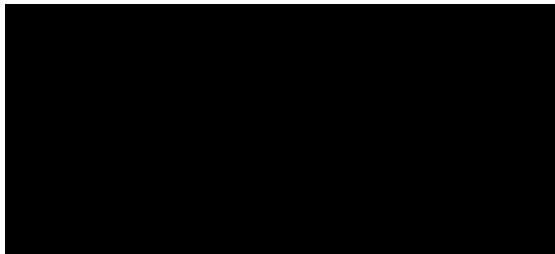
Signed on behalf of South Oxfordshire District Council and Vale of White Horse District Council



Tim Oruye
Head of Policy and Programmes

04 June 2025

Signed on behalf of NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board



Julie Dandridge
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17 June 2025