

18th May 2022

Dear Philip/Stuart,

NPPF, CIL and local Infrastructure needs disconnect.

I have spent time looking at revisions to the NPPF which were made in 2021. These are summarised in the attached **Changes to the NPPF 2021**.

It is with the 2021 changes in mind, and proposed changes to the NPPF, which Stuart discussed on Saturday 14th, that I write.

As you are aware, issues at Grange Park Surgery in Burley in Wharfedale and a similar set of potential issues at the Kirklands Surgery in Menston which is linked to a surgery in Guiseley.

To give you a background at Grange Park Surgery, we have:

- The building was opened in 1984 and was to accommodate 4,600 patients. The surgery now has a little under 7,000 patients, with that number set to rise significantly.
- We now have an additional 600+ homes that are to be delivered in our community, plus a 52-apartment retirement home and a 76-bed care home. The first 100 homes at Greenholme Mills have just been released for occupancy.
- The existing surgery does not have the space, or the Doctors required to handle the additional head count, and the surgery is now considering **closing its books** to new patients. I have already suggested that the Surgery do so ahead of completion of the new care home at the Generous Pioneer, as this will stretch the service beyond its current capacity.

To put things plainly, the existing nursing home requires a half day, one day per week for surgery visits, and it is anticipated that the new home will require an additional half day each week for visits. This will further exacerbate issues at Grange Park for patients and patient waiting times.

- The Doctors already experience a tripling of duty appointments on a Monday morning from 15 to 45 appointments within the last 18 months.
- First-time routine appointments now take more than a week to schedule, although emergency appointments are available daily. The doctors often stay at the surgery after hours and have to catch up on paperwork in the evening.

Clearly, this situation cannot go on indefinitely, and investment in infrastructure to support additional housing is urgently needed. The issue as I see things, relates to **Paragraph 11 of the NPPF, The presumption in favour of sustainable development**.

Broadly speaking, paragraph 11 assumes that a development is sustainable. Parts c and d (i & ii) are not normally considered in an up-to-date planning policy, which is precisely where there's one disconnect in current planning policy. Council's and developers have the wherewithal in such a situation, and the public are at a disadvantage. Realistically, Council's and developers need to

demonstrate how sustainability can be achieved, and I know that Stuart Andrew is working on this issue (NPPF paragraphs 7 and 134 of the revised NPPF 2021). I don't believe that these policies are sufficiently robust at present.

The disconnect in CIL and the New Homes Bonus.

The methodology of CIL and the New Homes Bonus do not currently support local infrastructure need, rather councils can choose to spend CIL and the New Homes Bonus on what/wherever they choose, and it is they who receive the Lions share.

Town and Parish Councils, receive 15% or 25% of the CIL, dependant on whether a Neighbourhood Plan is in place. This is normally used to support local initiatives, Doctors surgeries in their nature as a private business (although providing almost totally an NHS service) are not normally considered. If a Town or Parish Council was to allocate CIL to such a project, then this would undermine the need for a local council to provide any support. Yet it is local Councils who benefit the most from new housing development, particularly that on green belt. Green belt is perhaps the least well served in terms of infrastructure, simply because green belt is often located in rural communities.

I know that changes are in the pipeline, however, these are not likely to be retrospective. I would therefore request that CIL charging authorities should receive a mandate to spend at least 30% of their portion of the CIL on local infrastructure. If that's not possible, could this rule be applied to the New Homes Bonus? Bradford Council are currently to receive £4 million in CIL, plus a substantial figure for the New Homes Bonus.

The requirement at Grange Park Surgery, Burley in Wharfedale.

Here in Burley in Wharfedale, we're not unique, the GP Surgery needs to increase its capacity by at least 50%. This requires:

- A building extension with an additional 50% floor space.
 - This would provide 3 additional consulting rooms.
 - 3 more offices
 - A staff room, currently there are no staff facilities for doctors to have lunch/breaks.
 - A meeting room.
 - A community room for community work, eg: Mental Health, Wellbeing Services, etc. These are all currently supported by community groups in external facilities, all currently funded by charitable donations and organisations.
 - Total building cost of £500,000 - £700,000.

Dr. Caroline Rayment has already had meetings with Philip Davies MP, Robbie Moore MP, the CCG and NHSE. Whilst help and advice has been given, there's a lack of ministerial and NHSE support.

For the avoidance of doubt, the NHSE have £12 million to spend improving health care facilities over the next 3 years for the whole of West Yorkshire. Grange Park Surgery are already on the application list but have been told that they are unlikely to receive any funding. There are 6 Doctors Surgeries on the list in the Bradford District, 2 of which have been already allocated funding. Here in Burley in Wharfedale, we are informed by the NHS that the only way forward is for Partners at Grange Park Surgery to borrow money against the surgery. This could then be claimed back as an NHS rental payment over a 25-year period.

NPPF Solar power and Heat Pumps.

This is my last area of concern. There's clearly a need to move away from traditional fossil fuels, and the crisis in the Ukraine has brought this issue to a head. Clearly, to satisfy the UK's energy need in the short term will involve re-opening the North Sea as well as other measures like Nuclear Energy. However, reliance on fossil fuels is not a long-term solution, supplies are finite, so there needs to be a shift in our national energy policy.

It now makes perfect sense to plan longer term. There are tried and tested energy solutions that would complement, fossil and nuclear in the medium/long term. These are Solar Energy, and Heat Pumps, which deliver 28% of the UK's energy needs across three-quarters of the year.

The sector is beginning to respond to increases in energy prices and the infrastructure is evolving. Might I therefore suggest, that from mid-2023, that all new homes are fitted with Photo Voltaic panels and heat pumps, in preparation for a decline in the supply of fossil fuels. Not only would this impact on the UK's need to generate more energy to keep pace with demand, but it would also put the UK on a path of energy independence, accord with the ECO4 energy obligation scheme, go some way towards carbon net zero for the UK, and our national reliance upon Oil and Gas from unscrupulous regimes like the Russian Federation.

At present on 3% of our Gas supply comes from Russia, I would not like to see our dependence rise as it has in the EU.

Naturally, such a move has its Pros and Cons, which I believe are:

Cons.

- Short term cost implications at time of purchase on new builds.
- If Government and/or Councils do not address the cost of zero emission/carbon neutral homes up front, we're effectively just kicking the cost further down the line.
- Future cost of making homes zero emission/carbon neutral is an issue government is currently trying to address on older housing stock. Many people will not be able to afford the upgrade cost (there are no economies of scale, and installation is complex), so work may never be carried out. A good analogy would be the introduction of solar panels. Consider how few homes have migrated to solar to date.
- Further government subsidies to encourage take up of zero-carbon measures are a cost burden to the taxpayer. The ECO scheme introduced in 2013, was a failure. These subsidies could be put to better use elsewhere in the economy.
- Carbon output will be maintained until such time that zero carbon upgrades are installed, making it more difficult to achieve defined Carbon targets both locally and nationally.

Pros.

- House builders and developers have the economies of scale to make homes zero emission/carbon neutral far more cheaply than individual homeowners/landlords.
- Zero percent VAT on these technologies at build, another opportunity to save money.
- This technology is far more easily installed before build, ready at point of sale.

- Installation up front will work out cheaper than delayed upgrade.
- Immediate CO2 benefits delivered towards government and local authority aspirations for a zero-carbon economy.
- Mortgage terms of 20 years plus, mean that this cost is spread over the term and is likely to be a minimal monthly charge.
- Immediate energy savings will help to offset the additional purchase and mortgage costs.

That's all for now.

Regards,

Bob