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21st October 2024

<https://hertsandwestessex.icb.nhs.uk>

Via email: LDPconsult@eppingforestdc.gov.uk

Epping Forest District Council
Planning Policy
Civic Offices
323 High Street
Epping
CM16 4BZ

Dear Sir/Madam,

Re: Epping Town Council Neighbourhood Plan Regulation 16 Publication

Thank you for consulting the Hertfordshire and West Essex Integrated Care Board (HWE ICB) on the Epping Town Council Neighbourhood Plan Regulation 16 Publication. As a statutory planning consultee, this response provides an NHS HWE ICB and system partner response covering primary and community and mental healthcare. Please note that the Princess Alexandra Hospital NHS Trust has responded under separate cover. Both consultation responses should be read alongside one another.

The HWE ICB has reviewed the Neighbourhood Plan - its policies, supporting text and action plan in relation to health services to ensure compliance with national planning policy concerning the planning and delivery of healthcare services.

The HWE ICB **objects** to the Neighbourhood Plan as currently drafted which does not reflect the healthcare strategy for the area for primary, community and mental healthcare and acute based services. To remove the HWE ICB's objection to the Neighbourhood Plan will require amendments in line with the representations below.

Dr Jane Halpin, Chief Executive

Rt. Hon. Paul Burstow, Chair

1. Joined up Health and Care

The NHS HWE ICB is a statutory body with responsibility for commissioning NHS health services. In line with the Health and Care Act 2022, the HWE ICB and our partner NHS Trusts and NHS Foundation Trusts work in collaboration with local Health and Wellbeing Boards to arrange and provide NHS services to:

- improve the general health and wellbeing of Hertfordshire and west Essex residents and improve health care services in the area.
- tackle the inequalities which affect people's physical and mental health, such as their ability to get the health services they need, and the quality of those services help tackle health and wider inequalities.
- get the most out of local health and care services and make sure that they are good value for money.
- help the NHS support social and economic development in Hertfordshire and west Essex.

Of note, the Hertfordshire and West Essex Integrated Care System (HWE ICS) is a local partnership that brings health and care organisations together to develop shared plans and joined up services. Together with place-based partnerships and integrated neighbourhood teams, the HWE ICS focusses on prevention and integrated care between primary and secondary care, physical and mental health and between health and social care.

The Hertfordshire and West Essex Integrated Care Partnership (HWE ICP) was set up in 2022 and is a statutory joint committee established jointly by Hertfordshire County Council, Essex County Council and the HWE ICB. It comprises representation from the HWE ICB, the county councils and district and borough councils, the Police, Fire and Crime Commissioner, care providers and leads from the VCSFE Alliance.

To support improvements to the health and care outcomes and experiences of Hertfordshire and West Essex residents, the HWE ICP has produced a 10-year Integrated Care Strategy which was approved in December 2022. The Strategy includes a Delivery Plan and covers six strategic priorities. They are:

Priority 1: give every child the best start in life.

Priority 2: support our communities and places to be healthy and sustainable.

Priority 3: support our residents to maintain healthy lifestyles.

Priority 4: enable our residents to age well and support people living with dementia.

Priority 5: improve support to people living with life-long conditions, long-term health conditions, physical disabilities, and their families.

Priority 6: improve our residents' mental health and outcomes for those with learning disabilities and Autism.

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Local and Neighbourhood Plans and their policies not only have an important role to facilitate improvements to health infrastructure, but they are also an important mechanism to improve people's health, through responding to the health needs of the local population, by positively promoting health and wellbeing and addressing local health inequalities.

2. NHS Primary Healthcare

The HWE ICB has produced a Primary Care Strategic Delivery Plan, 2023 -2026 which sets out how the HWE ICB wants to develop GP, community pharmacy, dentistry, and ophthalmology services across Hertfordshire and west Essex to benefit patients and communities over the next three years.

The Primary Care Strategic Delivery Plan has three objectives covering:

1. Joined up local teams of health and care.
2. Improved access for urgent same day health.
3. Improved prevention.

These objectives are supported by several key areas of work including the improved use of buildings used to deliver services, developing the primary care workforce, better use of data, information and digital technology and ensuring good value contracts and locally funded projects.

Within the HWE ICB there are 34 Primary Care Networks (PCNs) across the 14 localities, each covering a population of between circa 27,000 and 68,000 patients. Primary Care Networks (PCNs) are groups of GP practices working together with community, mental health, social care, pharmacy, hospital, and voluntary services in their local areas to meet the needs of the population.

PCNs are small enough to provide the personal care, valued by both patients and GPs, but large enough to have impact and economies of scale through better collaboration between GP practices and others in the local health and social care system.

PCNs are expected to deliver services at scale for its registered population whilst working collaboratively with acute, community, voluntary and social care services in order to ensure an integrated approach to patient care. Patients are at liberty to choose which GP practice to register with providing they live within the practice boundary. However, the majority of patients choose to register with the surgery closest and/or most easily accessible to their home for the following reasons: it is the quickest journey, accessible by public transport or is in walking distance), parking provision, especially for families with young children and for older adults.



The HWE ICB keeps up to date PCN patient lists and closely monitors the current and future capacity of GP surgeries against Local Plan allocations/ housing trajectories.

Chapter 5 - Epping's Growth and Development

Draft Policy 3: Development Proposals

The HWE ICB supports the policy intention of Policy 3 in relation to Section 106 contributions but would request the last sentence is amended and strengthened to say:

“Section 106 contributions will be sought from all new developments to support identified onsite and offsite infrastructure requirements.”

Paragraph 5.9 & Policy 5

It is noted that the Epping Forest Local Plan Policy P1(M) states that the Strategic Masterplan must make provision for offsite or onsite medical provision. However, for the reasons explained below, the HWE ICB does not require a new **onsite** health facility within the South Epping Local Plan Strategic Allocation. As such the reference to a ‘GP Surgery’ in the first sentence of paragraph 5.9 and in Policy 5 should be deleted.

There are four development sites that fall within the South Epping Strategic Allocation, which will be brought forward by a Development Consortium comprising Barwood Land, Bellway Homes, LandVest Developments and Mount Street Developments. It is noted that planning applications from Barwood Land and Bellway Homes are programmed to come forward during Autumn 2024.

The HWE ICB in responding to the South Epping Masterplan Framework and Design Code in a letter to the Council dated 26th July 2024, was clear that the HWE ICB does not require new health infrastructure in the form of an onsite GP surgery within the South Epping Masterplan Area.

In reviewing the Primary Care Network (PCN) data and patient list sizes, both The Limes Medical Centre and High Street Surgery in Epping will be unable to accommodate the additional patient numbers arising from these developments, as well as from other developments coming forward within Epping and within its vicinity.

Following an optioneering exercise, the HWE ICB has identified and prioritised The Limes Medical Centre and is exploring capital projects to either extend or relocate this Practice drawing on the opportunities within the existing NHS estate. One option that is being explored is relocating to St Margaret’s Hospital, given its close location to the Limes Medical Centre. This work is on-going.

As such that the options being explored do not require the need for new health infrastructure in the form of onsite provision within the South Epping Local Plan Strategic Allocation. Please therefore amend paragraph 5.10 bullet point five as follows:

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- *Improvements to health infrastructure provision for the area covering primary, community and mental healthcare and acute based services.*

It has been noted that the integration of all four developments into Epping and the wider Epping area has been clearly prioritised and articulated in the South Epping Strategic Masterplan Framework. The provision of direct and safe pedestrian and cycle routes to key destinations, together with providing resident/patients the offer of other sustainable modes/choice of travel is crucial to enable access to existing NHS services, including The Limes Medical Centre and High Street Surgery in Epping, and to St Margaret's Hospital. As such the attention given in the Masterplan Framework and in the Neighbourhood Plan to connections into Epping and its wider area, and sustainable choices of travel is welcomed.

Chapter 9 – Local Facilities for Health, Arts, Culture and Recreation

Draft Policy 13: Enhancing Social, Sporting, Play, Cultural and Community Facilities

For the reasons explained above, there is no requirement for onsite healthcare provision within the South Epping Local Plan Strategic Allocation. Please therefore amend bullet point one as follows to ensure the policy better reflects the HWE ICB's strategy for future healthcare infrastructure and service provision within the locality.

- *Improvements to health infrastructure provision for the area covering primary, community and mental healthcare and acute based services.*

Further, please delete the reference to a health hub in paragraph 9.5.

Chapter 13 – Making it Happen

The HWE ICB is in full agreement with the representations made by the Princess Alexandra Hospital NHS Trust (PAHT) in relation to the draft Neighbourhood Plan's Action Plan, namely it is not within the Town Council's or District Council's remit to determine what healthcare services and facilities should be provided by the NHS and at what premises.

The draft Neighbourhood Plan policies and Action Plan is inappropriately prescriptive and contrary to the National Planning Policy Framework in that it does not take account local strategies to improve health and well-being for all sections of the community, which are being progressed by the HWE ICB and the NHS provider trusts including the PAHT.

In light of the above, please amend the health-related action item as follows:



Item

~~“Negotiate with Health Trust re. a new ‘health hub’ providing integrated GP/ pharmacy/ community health/ other health services such as chiropody and opticians/ GP/ sexual health at St Margaret’s Hospital (policies 3, 7 and 14)~~ Delivery of health infrastructure to support policies 3, 7 and 14, where there is an identified need”.

Lead Agency/others

Hertfordshire and West Essex Integrated Care Board and NHS System Partners

Funding

Developer Contributions

Timetable – Short/Medium/Long Term

Short term

Please do not hesitate to contact me if you require any further information or have questions of clarification arising from this response.

Yours faithfully,



Rachael Donovan
Town Planning Policy Manager
NHS Hertfordshire & West Essex ICB

