



GIG
CYMRU
NHS
WALES

Bwrdd Iechyd
Aneurin Bevan
Health Board

Representor No 4553

Accession No 19

Representation No

Ref: LT/seg

1 May 2013

Strategic & Development Plans Team
Caerphilly County Borough Council
Ty Pontllanfraith
BLACKWOOD
NP12 2YW

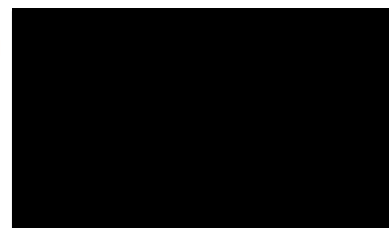
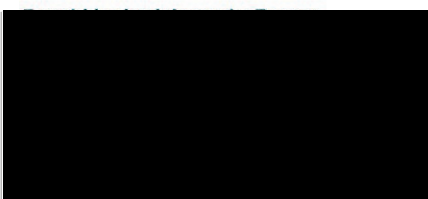
Dear Sir/Madam

Caerphilly County Borough Council Community Infrastructure Levy (CIL) Draft Charging Schedule Consultation

I write with regards the Draft Charging Schedule Consultation process and in particular the proposal relating to D1 Primary Healthcare Developments.

The "Draft Charging Schedule" proposal for the level of CIL for Primary Healthcare Developments results from recommendations from the District Valuer. These recommendations follow evaluation of new public-private healthcare developments defined as private investors constructing new primary care centres for the NHS (3PD) and that this market has remained resilient in the current economic downturn.

We feel that the District Valuer has not represented the whole financial funding process underpinning such healthcare projects. The sector may be comparatively resilient and new premises are built by the private sector, but they are publicly funded via the Welsh Government's/Health Board's payment of rent. Without that support the sector would be as weak as all those others which have correctly been left levy free.



Bwrdd Iechyd Aneurin Bevan yw enw gweithredol Bwrdd Iechyd Lleol Aneurin Bevan
Aneurin Bevan Health Board is the operational name of Aneurin Bevan Local Health Board

We would reaffirm our comment that[£] there has been a marked slowdown in the number of such schemes and a reduction in District Valuer recommended rental values from £180 per m², some 4 – 5 years age, to £149.50 per m² for the most recent approved scheme in Rhymney. Given the fact that the District Valuer is directly involved in agreeing the development rents for these schemes, with the aim of setting a level of rent which yields only just sufficient profit for the developer to proceed, then how can there be any “super profit” on which to base the levy.

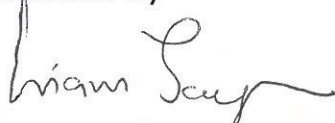
Notwithstanding the current Welsh Government funding crisis, the imposition of a CIL in Caerphilly, Rhondda Cynon Taf and Merthyr may result in what little money that may be available being channelled to the rest of Wales rather than in those council areas where the levy is applied, thus mitigating against health investment in areas of high deprivation and low economic status if the overall rental values are not supported by the District Valuer or Welsh Government.

If the purpose of a CIL is for the community to obtain some benefit from private sector profit which results from the grant of planning permission, then the provision of primary healthcare developments is a direct benefit to the community and as such Health developments need to be a beneficiary of CIL as the whole population will access GP facilities/services unlike schools which are age specific or restaurants which are leisure/economic specific. If Health should derive a benefit from CIL how much will be set aside from the council CIL to support health developments and what will be the mechanism to access such funding arrangements.

Finally, as your proposal is predicated on new public-private healthcare developments defined as private investors constructing new primary care centres for the NHS (3PD) schemes, I again request clarification on how this levy will be evaluated against formal NHS Capital funded projects and GP self funded development schemes which do not attract such profit benefits and external investment.

As requested in my previous consultation response of the 28 November 2012, given the potential implications of this proposal on the Health Boards ability to invest in future healthcare premises I would welcome the opportunity to meet with officials from Caerphilly County Borough Council in respect of this issue.

Yours sincerely



Dr Liam Taylor
Assistant Medical Director, General Practice

