

31<sup>st</sup> August 2021



Dear Sir/Madam,

**Ilkley Town Council – Ilkley Neighbourhood Development Plan 2020-2030 Regulation 16 Consultation**

Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).

**Foreword**

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

**Overview**

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS support NHS commissioners to deliver a local health and public estate that can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.

The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with integrated NHS strategies. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Our comments on the policies set out within the Ilkley Neighbourhood Plan are as follows.

## **Policy INDP2**

### **Introduction**

Policy **INDP2** states that when a non-community use (e.g. housing) is proposed to replace, either by conversion or re-development, one of the facilities listed below such development will only be supported when one of the following can be demonstrated:

- The proposal includes alternative provision, on a site within the locality, of equivalent or enhanced facilities. Such sites should be accessible by public transport, walking and cycling and have adequate cycle and car parking.; or
- Where facilities are considered to be no longer needed or suitable for continued community facility use, satisfactory evidence is put forward by the applicant that, over a minimum period of 12 months, it has been demonstrated, through active marketing of the site, that there is no longer a need or demand for the facility.

NHSPS objects to policy INDP2.

### **Context**

Policy INDP2 fails to address the need for flexibility within the NHS estate. NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed.

The NPPF is clear in stating that Local Plans should adopt policies that "take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community" (Paragraph 93b).

The policy currently fails to consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services.

Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use.

With this in mind, we are keen to encourage that a greater level of flexibility be granted to the NHS via modification of the wording of Policy INDP2. This will ensure that the NHS can promptly and efficiently respond to the healthcare needs of the residents as they arise.

NHSPS own the freehold to The Coronation Hospital, which is allocated for protection under draft Policy INDP2/19. NHSPS wish to reiterate the need for flexibility within the NHS estate, including The Coronation Hospital site.

**Amended Wording**

We would suggest the inclusion of additional wording (in blue) be included in Policy INDP2 to make this policy more robust:

“When a non-community use (e.g. housing) is proposed to replace, either by conversion or re-development, one of the facilities listed below such development will only be supported when one of the following can be demonstrated:

- a. The proposal includes alternative provision, on a site within the locality, of equivalent or enhanced facilities. Such sites should be accessible by public transport, walking and cycling and have adequate cycle and car parking.; or
- b. Where facilities are considered to be no longer needed or suitable for continued community facility use, satisfactory evidence is put forward by the applicant that, over a minimum period of 12 months, it has been demonstrated, through active marketing of the site, that there is no longer a need or demand for the facility; or
- c. **the loss or partial loss of a facility or site arises from a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities.”**

Yours sincerely,

Rowan Gilbert  
Town Planner

