



Property Services

Neighbourhood Planning
Milton Keynes City Council
Civic
1 Saxton Gate East
Milton Keynes, MK9 3EJ
neighbourhoodplanning@milton-keynes.gov.uk

NHS Property Services Ltd
10 South Colonnade
Canary Wharf
London E14 4PU
town.planning@property.nhs.uk
www.property.nhs.uk

12th April 2024

BY EMAIL ONLY

RE: Consultation on Newport Pagnell Neighbourhood Plan (Submission)

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

NHS Property Services

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. 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 supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Detailed Comments on Draft Neighbourhood Plan Policies

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Neighbourhood Plan in a way that supports sustainable growth.

Policy NP9 Developer Contribution policy

Policy NP9 sets out the overarching policy in ensuring there is sufficient provision for infrastructure alongside major housing schemes. The specific list of infrastructure includes school places, cycling, walking and green space. In line with Milton Keynes Local Plan Policy INF1 referred to in supporting paragraph 5.9.3, health infrastructure should also be clearly identified in the Neighbourhood Plan as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development.

In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan.

We also emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Neighbourhood Plan area.

The Neighbourhood Plan should emphasise that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures. As outlined in supporting paragraph 5.2.2.3, the Town Council has maintained engagement with the relevant Integrated Care Board (ICB) in determining the healthcare infrastructure facility required as a result of the Tickford Fields Development Site specifically. NHSPS welcomes the engagement between the ICB and the Town Council thus far, and recommend the continued engagement with the ICB for future developments in the area. In support of this, we further suggest the following process:

- Assess the level and type of demand generated by the proposal.
- Work with the ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure capacity in the locality.
- Identify appropriate options to increase capacity to accommodate the additional service requirements and the associated capital costs of delivery.
- Identify the appropriate form of developer contributions.

Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. As such, we encourage and welcome the Town Council to continue working with the NHS and its partners in the formulation of appropriate mitigation measures.

Policy NP7 Affordable Housing and Tenure

NHSPS support the principle of affordable housing provision, and we further recommend that as part of implementing Policy NP7, the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the neighbourhood plan area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:

- Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.
- Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.

Conclusion

NHSPS thank Milton Keynes Council for the opportunity to comment on the Newport Pagnell Neighbourhood Plan. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

Yours faithfully,

Hyacynth Cabiles

Town Planner

E: hyacynth.cabiles@property.nhs.uk

For and on behalf of NHS Property Services Ltd
