

## **West Bletchley Neighbourhood Plan, Reg 16 consultation responses**

### **NHS Property Services**

**c/o Hyacinth Cabiles**

### **Town Planner**

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.

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.

### **Draft Policy C1: Protected Social and Community Facilities**

Draft Policy C1 focuses on the redevelopment of existing community facilities, which requires a combination of Criterion 1-4 to be satisfied in order to justify the loss of the existing community facility use. NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be effective or positively prepared in its current form. Where healthcare facilities are included within the Neighbourhood Plan's definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community.

The policy context provided for Draft Policy C1 refers to Policy CC3 of the Milton Keynes Local Plan (Plan:MK). Plan:MK Policy CC3 focuses on the protection of community facilities and requires satisfaction of either Criteria 1 or 2 to justify the loss of an existing community facility. As drafted, the required Criterion within Policy C1 imposes an additional 12-month marketing requirement, which is an overly onerous requirement that is also not reflective of the requirements contained with the relevant Local Plan policy.

The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community.

All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about

whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.

Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Neighbourhood Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information, including a 12-month marketing period. To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification (shown in red italics) to Draft Policy C1 to ensure the principle of alternative uses for NHS land and property will be fully supported and, for general clarity and conformity with Policy CC3 contained within the Milton Keynes Local Plan:

Proposed Modification to Draft Policy C1:

“Redevelopment for other uses will be resisted unless it can be established that:

1. The services provided by the facility are no longer required **and this has been robustly evidenced by research and consultation;** and or
- ~~2. It can be demonstrated that the site has been actively marketed for an alternative social or community use for at least twelve months at a price reflecting its current use and condition; or~~
3. **2. Can be served in an alternative location within the parish and in a manner that is equally accessible to the local community; or**
- 3. Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, the requirements listed under Parts 1 and 2 of the Policy will not apply.**
- ~~4. In a manner that is equally accessible to the local community.~~

## Conclusion

NHSPS thank West Bletchley Council for the opportunity to comment on the West Bletchley 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.