



## Property Services

10 South Colonnade  
Canary Wharf  
London E14 4PU

Tel: [REDACTED]

Email: [REDACTED]

Twitter: @NHSPROPERTY

[www.property.nhs.uk](http://www.property.nhs.uk)

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Dear Sir/Madam,

### **Skegness Town Council - Skegness Neighbourhood Plan 2021-2031 Regulation 15 Consultation**

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

#### **Foreword**

NHSPS Previously provided comments to the Neighbourhood Plan consultation held at the end of last year. We note that our comments have not been taken into consideration, and that Policy C3 remains unchanged. As noted in our previous representations to the Neighbourhood Plan, 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.

We respectfully wish to submit comments to this round of consultation. Our comments on the policies set out within the Draft Skegness Neighbourhood Plan are as follows.

<b>Policy C3 (Community Health Facilities)</b>
<b>Introduction</b>
Policy <b>C3</b> states that existing health facilities should be retained and enhanced wherever possible. NHSPS <b>objects</b> to Policy C3.
<b>Context</b>
Policy C3 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 C3. This will ensure that the NHS can promptly and efficiently respond to the healthcare needs of the residents as they arise.

#### **Amended Wording**

We would suggest the inclusion of additional wording (in blue) be included in Policy C3 to make this policy more robust:

“Applications involving the loss of community health facilities for which there continues to be an established need will be resisted unless adequate alternative provision is or will be made available in a location supported by the local community within an appropriate and agreed timescale. **Development (including change of use) that involves the loss or replacement of existing community facilities/services will be permitted where 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.** Applications for new community health facilities or improvements to existing community health facilities will be supported subject to the following criteria:

- A. The location is accessible or can be made accessible through improved opportunities for walking, cycling and access by public transport; and
- B. The new development is compatible with its surroundings; and
- C. Adequate provision can be made to meet the requirements for additional parking generated by users of the facility without significant adverse impact on the environment and highway safety in the local area, in accordance with relevant policies outlined in Chapter 9 of this Neighbourhood Plan; and
- D. Applications for major development are supported by a Health Impact Assessment commensurate with the size and nature of the development proposed.”

NHSPS thanks Skegness Town Council for the opportunity to comment on the Regulation 15 Draft Skegness Neighbourhood Plan and hopes the proposed amendments are considered constructive and helpful.

We look forward to receiving confirmation that these representations have been received. Should you have any queries or require any further information on the enclosed, please don't hesitate to contact me.

Yours sincerely,

**Miriam Rogers** | Senior Town Planner

**NHS Property Services Ltd**  
**Regent House, Heaton Lane, Stockport, Cheshire SK4 1BS**