

**NHSPS Response to Matter 6, Issue 7, Question 130****Qu.130: Is Part 4 positively prepared in relation to infrastructure providers' service transformation plans?**

1. This response follows a representation submitted at Regulation 19 stage, in which NHSPS sought modifications to Policy CI1.
2. The policy sets out the criterion the Council requires to be demonstrated should a development proposal result in the loss or reduction of land or buildings currently or last used as a community facility. In line with supporting paragraph 12.5, this includes health facilities.
3. Following further review, NHSPS do not consider this approach to be effective for the purposes of Part 4 of Policy CI1. The requirements for health commissioning and the form of any health provision are a decision for local health commissioners and should not be constrained by planning policy. As drafted, Policy CI1 does not consider the rigorous disposal process adopted by local health commissioners in order to support service transformation plans.
4. NHSPS requests the following modification (*shown in red italics*) to ensure the Local Plan is positively prepared and effective in defining the requirements to justify the loss of health care infrastructure, under Part 4 of Policy CI1:
  - d. A lack of need is demonstrated (through a 12 month period of marketing); or
  - e. Acceptable alternative provision exists or is proposed concurrently to maintain the community's ability to meet its day-to-day needs; or c. the loss or change of use of an existing built community facility is part of a wider public service estate reorganisation; *or*
  - f. *Healthcare facilities are formally declared surplus to the operational requirements of the NHS or identified as surplus as part of a published estates strategy or transformation plan."*
5. "The council will not support the loss or reduction of land or buildings currently or last used as a community facility unless:
  - d. A lack of need is demonstrated (through a 12 month period of marketing); or
  - e. Acceptable alternative provision exists or is proposed concurrently to maintain the community's ability to meet its day-to-day needs; or c. the loss or change of use of an existing built community facility is part of a wider public service estate reorganisation; *or*
  - f. *Healthcare facilities are formally declared surplus to the operational requirements of the NHS or identified as surplus as part of a published estates strategy or transformation plan."*
6. Alongside, or alternatively within supporting paragraph 12.10:
  7. "Where the loss of a community facility is proposed the applicant should either provide evidence of a lack of need through a 12 month period of marketing which demonstrates engagement with the community and likely stakeholders to sustain the facility and to find an appropriate alternative community use; or demonstrate that acceptable alternative provision exists or is proposed in the local area and is accessible to people; *or for healthcare facilities, demonstrate these are declared surplus or identified as part of an estates strategy or service transformation plan where investment is needed towards modern, fit for purpose infrastructure and facilities."*
8. The NHS needs to retain the flexibility to implement its health commissioning strategy (at pace) to meet the needs of the population at any time and consider modifications to be necessary to ensure effective implementation of Policy CI1 in respect of health care provision.

Word count: 437 words