

By Email: planningpolicy@eastdevon.gov.uk

Planning Policy Team,
East Devon District Council,
Blackdown House,
Border Road,
Honiton,
EX14 1EJ

99 Gresham Street
London
EC2V 7NG

Email: [REDACTED]
Twitter: @NHSPProperty
www.property.nhs.uk

Date: 22 June 2021

Dear Sir/Madam,

Colyton Parish Neighbourhood Plan: Submission version

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 and 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.

A key part of NHSPS' role relates to the provision of new healthcare facilities with the goal of ensuring that the healthcare needs of communities can be met. NHSPS works with commissioners and care providers to identify and respond to local property needs. As such, it is involved in the acquisition and development of new facilities, and the redevelopment of existing facilities. Furthermore, another important aspect of NHSPS' role is to dispose of land and property assets or facilities that have been identified as surplus to NHS requirements by Commissioners.

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 the integrated approaches set out within NHS Health Estate Plans. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Overview

NHSPS, who will henceforth be referred to as 'we' within this response, believe the Colyton Parish Neighbourhood Plan (herein referred to as the Neighbourhood Plan) requires some modification in order to produce a more robust and sounder document. The aforementioned issues will be addressed in the section titled 'Our representation'.

Our representation

We concur with the National Planning Policy Framework 2019 (NPPF) which is referred to in paragraph 3.2 of the Neighbourhood Plan and states that "neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies".

The National Planning Policy Framework is also clear that 'Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for infrastructure and community facilities (such as health).' Paragraph 34 goes on to state that 'Plans should set out the contributions expected from development.' Alongside this, they should include the levels and type of infrastructure required over the plan period.

It was noted that an approved objective of the Neighbourhood Plan is to ensure adequate infrastructure is in place; we support this objective and would suggest that consideration for health infrastructure be recognised in such instances especially in light of the comments made in paragraph 11.2 of the Neighbourhood Plan.

Historically the NHS has not had appropriate recognition of its role in supporting the development of new communities.

It can generally be acknowledged that larger residential developments often have a more significant impact in terms of the need for additional healthcare provision for future residents, suggesting that a planning obligation requiring that the development delivers a new or improved healthcare facility is necessary; however significant cumulative impacts of smaller residential developments should also be recognised, and health facilities should be put on a level footing with affordable housing and other community infrastructure when receiving funds; to ensure adequate infrastructure is in place given their strategic importance.

As paragraph 8.4 of the Neighbourhood Plan suggests the Parish is expected to grow in population size over the next 20 years, it is only appropriate that sufficient consideration is given to the future implications on health infrastructure and services needed to alleviate anticipated pressure or improve health infrastructure as part of any of the residential development.

The Neighbourhood Plan should consider the introduction of policy wording that would ensure that health has access to a more equitable share of developer contributions and recommend criteria for the allocation of health infrastructure monies that come through both S106 and Community Infrastructure Levy (CIL) funding routes. This should be at a level to support investment in all forms of healthcare provision to meet the demands of housing growth across the Colyton Parish area, including primary, secondary, and mental health services. Moreover, Site promoters and developers must be encouraged to consider the health impacts of their proposed developments from the outset.

In addition to this, we would suggest the inclusion of following additional wording to Policy No Coly7 (in blue italics) be included to make to the policy more robust:

New housing development within the Colyton Built-up Area Boundary will be supported provided the:

- i. design and layout are generally in keeping with the character of the town and existing development around the site; ii. boundary treatments complement the character of the area;
- ii. opportunities to provide safe and secure pedestrian and cycle links throughout the development, and to and from other parts of Colyton are incorporated;
- iii. opportunities to re-use existing buildings on the site are utilised wherever possible;
- iv. the mix of housing sizes and tenures reflects local needs and contributes to the diversity of the area's housing mix; and
- v. *new development help tackle health inequality, as far as practicable, and maximise its positive contribution to health and wellbeing, whilst avoiding any potential negative impacts of new development*

It is vital that Colyton Parish Council work with NHS organisations to plan for the healthcare infrastructure required to support the levels of growth anticipated within the Neighbourhood Plan. We would encourage the inclusion of health providers being actively involved in in the preparation of plans, as this will help to enable the NHS to provide a comprehensive healthcare service to the Parish area's growth proposals.

Summary

NHSPS thanks Colyton Parish Council for the opportunity to comment on the Neighbourhood Plan and hopes the proposed recommendations and comments put forward in our representation are considered constructive and helpful.

Whilst we acknowledge the need for and support the delivery of the Plan, for the reason identified above, we believe that additional policy could be introduced to be more effective and consistent with national policy.

We look forward to reviewing future iterations of the plan and 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.

Ari Akinyemi

NHS Property Services Ltd – Town Planner