

Planning Policy
Environment and Community Services
Town Hall
Wandsworth High Street
London
SW18 2PU



www.property.nhs.uk

Date: February 2022

Dear Sir / Madam,

Wandsworth Local Plan Publication (Regulation 19) Version January 2022

Thank you for the opportunity to comment on the above document. These representations are made by NHS Property Services (NHSPS) to the London Borough of Wandsworth (“the Council”) in respect of their Publication Draft Local Plan. They follow on from representations made by NHSPS on the Issues Document, February 2019 and those made in February 2021 on the Wandsworth Pre-Publication Draft Local Plan (Regulation 18). We ask that this response be read in conjunction with those comments previously made.

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, care providers and local councils to identify and respond to local healthcare and property needs. As such, it is involved in the acquisition and development of new facilities, and the redevelopment of existing facilities. Furthermore, NHSPS is required to dispose of land and property assets or facilities that have been identified as surplus to NHS requirements by Commissioners. This has resulted in the sale of 441 surplus properties, generated £381 million of sales receipts for the public purse and contributed to land sales supporting 6,607 housing units since April 2013.

Background

NHSPS is the freehold landowner of a number of health facilities in Wandsworth. Discussions have previously taken place in support of the following draft site allocations:

- OUT1 Balham Health Centre, 120 - 124 Bedford Hill, London, SW12

- OUT5 Bridge Lane Medical Group Practice, 20 Bridge Ln, Battersea, London SW11 3AD
- RO3 Queen Mary's Hospital car park, SW15

Our representations review these sites in turn taking account of proposed land use allocations and amendments since the Pre-Publication Draft Local Plan (Regulation 18).

Site Allocations Outside the Spatial Areas

OUT1 Balham Health Centre

Balham Health Centre is allocated for a mixed-use development including residential and expansion of healthcare facilities. The site itself is in the freehold ownership of NHSPS and we have been working to understand development potential in light of health care requirements. NHSPS therefore continue to support the proposed allocation of this site in principle and given the urban context, close to Balham centre, there is potential to intensify the existing land use and provide a high-quality building and much needed residential dwellings. The development of this site will allow for investment in new healthcare buildings and services for the community.

NHSPS note those comments made by officers within the Statement of Consultation Regulation 18 document. To guarantee the allocation is sound, by being sufficiently flexible and to ensure there is no risk to the deliverability of healthcare facilities and new housing, suggested amendments are provided below.

Nature – **Suitable** Existing trees and green space must be re provided on site

Justification: It may be impractical to re-provide trees and green space on a like for like basis. To allow for the proper planning of the site and to achieve improvements in green infrastructure and biodiversity, trees and green space provision should seek to enhance the existing situation. NHSPS believe such an approach would be consistent with draft policies LP55 and LP56.

Site allocation: Mixed use development including residential and ~~expansion~~ **improvement** of healthcare facilities **with enabling residential development, or residential only if the existing services are relocated within an alternative healthcare facility in the wider area.**

Justification: As set out within our previous representations, the NHS requires flexibility within the estate. Should services be re-provided elsewhere, then the site could be developed for residential use only. Any relocation would involve improving services, potentially co- located/integrated with other uses and in a more accessible location in accordance with commissioning requirements.

NHSPS note officers' comments (1465) stating that 'The site allocation requires the re-provision and expansion of healthcare facilities and parking on site and should not be relocated to another area as it is very close to Balham town centre.' NHSPS believe this approach to be inconsistent with part A5 of Policy S2 within the London Plan, which sets out that 'Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to...identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.'

If an alternative location is considered more suitable for improved health services, then the site will become surplus and must be considered for other land uses. As explained, this would be subject to commissioning requirements and in coordination with the Council and community. The proposed

amendments would ensure this is appropriately facilitated.

The replacement of 'expansion' with 'improvement' will ensure the NHS is not committed to providing an increased amount of healthcare floorspace on site. It is important to understand that changing models of care allow for increased service provision but within a smaller a building. The emphasis should be on improving and modernising facilities, not necessarily expanding.

OUT5 Bridge Lane Medical Group Practice

Bridge Lane Medical Group Practice is allocated for a mixed-use development including residential with re-provision and expansion of healthcare facilities and parking.

As with Balham Health Centre, the site is in the freehold ownership of NHSPS, and we have been considering development options in light of health care requirements. NHSPS therefore support the proposed allocation of this site. Options have included re-provision of the existing health facility and enabling residential and/or a wholly residential scheme, subject to healthcare commissioning requirements. Any value generating residential development on this site will allow for reinvestment in healthcare services, consistent with our earlier comments on Balham Health Centre.

NHSPS note those comments made by officers within the Statement of Consultation Regulation 18 document. To guarantee the allocation is sound, by being sufficiently flexible to ensure there is no risk to the deliverability of healthcare facilities and new housing, suggested amendments are provided below.

Nature – Suitable Existing trees and green space must be re provided on site

Justification: As with Balham Health Centre, it may be impractical to re-provide trees and green space on a like for like basis. To allow for the proper planning of the site and to achieve improvements in green infrastructure and biodiversity, trees and green space provision should seek to enhance the existing situation. NHSPS believe such an approach would be consistent with draft policies LP55 and LP56.

Site allocation: Mixed use development including residential and expansion of healthcare facilities **with enabling residential development, or residential only if the existing services are relocated within an alternative healthcare facility in the wider area.**

NHSPS note officers' comments (1483) stating that 'The site allocation requires the re-provision and expansion of healthcare facilities and parking on site and should not be relocated to another area as it is very close to Balham town centre.' NHSPS would point out that the site is not close to Balham town centre and believe this to be an error.

As with Balham Health Centre however, the proposed amendments will ensure the allocation is consistent with part A5 of Policy S2 within the London Plan, which sets out that 'Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to...identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.'

The replacement of 'expansion' with 'improvement' will ensure the NHS is not committed to providing an increased amount of healthcare floorspace on site. It is important to understand that changing models of care allow for increased service provision but within a smaller a building. The emphasis should be on improving and modernising facilities, not necessarily expanding.

Similarly, we would also point out again that parking provision should be reflective of any future development and current policy requirements. The allocation should not seek to expand provision.

Policy LP17 Social and Community Infrastructure

NHSPS continue to support the Council's intention to work with its key partner organisations and developers to ensure that high quality social and community facilities and services are provided and/or modernised in order to meet the changing needs.

It is welcomed that the Council recognise and support investment plans and strategies for the provision of health facilities and services including for mental health care, GP and local hospital services.

NHSPS support amendments to LP17, which now includes part B6 stating that 'The loss of social, community or cultural infrastructure will be resisted. Proposals involving the loss of such infrastructure will need to demonstrate clearly...that for existing health or emergency service facilities, loss will only be permitted where facilities are declared surplus to need as part of any strategic restructuring of health or emergency services demonstrated through an overarching estates strategy or similar needs-based assessment.'

NHSPS do however continue to seek clarity that if part B6 is successfully applied to the disposal or redevelopment of an existing NHS asset, then Parts B 1 -5 will not apply. This clarification would ensure LP17 is consistent with London Plan Policy S1 which allows for the independent loss of social infrastructure where 'the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.' See Policy S1 Part 2 and Part G.

Closing

We trust these representations are informative at this stage of the new Local Plan preparation and will be taken into consideration. Should you require any clarification on the issues raised in these representations, please do not hesitate to contact myself.

Yours sincerely,

Will Everson
NHS Property Services