

From: [REDACTED]
To: [Local Dev. Framework](#)
Subject: Craven Local Plan consultation response
Date: 13 February 2018 12:51:43
Attachments: [Craven Local Plan comments form.pdf](#)

Dear Sir/Madam,

Please find attached NHS Property Services Ltd's (NHSPS) response to the above consultation.

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. NHS Property Services 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.

Please could you acknowledge receipt of the attached response.

Best regards,

[REDACTED] | Graduate Town Planner
NHS Property Services Ltd
99 Gresham Street, London, EC2V 7NG
M: [REDACTED] | E: [REDACTED]
[@NHSPROPERTY](#) | www.property.nhs.uk

Revised Statement of Community Involvement (SCI)



Public Consultation: Tuesday 2nd January 2018 to Tuesday 13th February 2018

Comments Form

Craven District Council invites you to respond to the consultation in whichever format you find best. However, we would encourage you to use this comments form, which we have prepared, because it will help us to record, analyse and acknowledge everyone's comments more quickly and efficiently.

Name & address (email or postal):



NHS Property Services
99 Gresham Street
London
EC2V 7NG

Please return completed forms to localplan@cravenc.gov.uk or Planning Policy Team, Craven District Council, 1 Belle Vue Square, Skipton, BD23 1FJ, no later than 5pm on Tuesday 13th February 2018.

Details of which section of the draft revised SCI you are objecting to/supporting (section & paragraph number)	Nature of the comment (object, support, other)	Detail of the comment (concise and constructive criticism/support/information)
Policy INF2 – Community Facilities and Social Spaces	Object	Policy INF2 (Community Facilities and Social Spaces) of the Local Plan 2033 restricts the loss or change of use of existing 'community facilities'. Whilst Paragraph 70 of the NPPF states that planning policies and decisions should 'guard against the unnecessary loss of valued facilities and services', the overarching objective of this same paragraph is to ensure the delivery of facilities and services for the community. 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 unneeded and unsuitable healthcare facilities for best value can be prevented or delayed. This has a direct impact on the provision and quality of healthcare facilities and services, as it can prevent or delay the reinvestment of capital in modern and fit-for-purpose facilities and require ongoing revenue to be spent on maintaining inefficient parts of the estate. Furthermore, most surplus healthcare facilities are purpose built and at the end of their useful lives, and thus highly unlikely to be viable or suitable for other uses. It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal. An essential element of supporting the wider transformation of NHS services and

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		<p>the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing). Much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses), and should not be subject to restrictive policies or periods of marketing.</p>