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BY EMAIL ONLY

RE: Consultation on Draft Canterbury Local Plan 2040 (Regulation 18)

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

NHS Property Services

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. 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 supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Detailed Comments on Draft Local Plan Policies

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to developer contributions or health impact assessments, we would request the Council engage the NHS in the process as early as possible.

Draft Policy SS6 Sustainable design strategy for the district and DS6 Sustainable Design

Draft Policies SS6 and DS6 seek to achieve net-zero operational carbon emissions on new residential and commercial development and for new development to be designed to achieve net-zero operational carbon emission standard, respectively. NHSPS fully support policies that promote carbon neutral development, and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.

Draft Policy SS5 Infrastructure Strategy for the district and DS7 Infrastructure Delivery

Draft Policies SS5 and DS7 set out the overarching policy for ensuring development makes a positive contribution to sustainable growth through the delivery of appropriate infrastructure in a timely manner and through the use of appropriate mechanisms. NHSPS welcomes the recognition of health infrastructure as key infrastructure under drafted Policy SS5, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan.

We also emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Local Plan area. NHSPS recommend that the Local Plan have a specific section in the document that sets out the process to determine the appropriate form of developer contributions to health infrastructure. This would ensure that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements.

The Local Plan should emphasise that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures. NHSPS recommends that the Council continue to engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. As a starting point, we suggest the following process:

- Assess the level and type of demand generated by the proposal.
 - Work with the ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure capacity in the locality.
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- Identify appropriate options to increase capacity to accommodate the additional service requirements and the associated capital costs of delivery.
- Identify the appropriate form of developer contributions.

Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be emphasised that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures.

Draft Policy DS1 Affordable Housing

NHSPS support the principle of affordable housing provision, and we further suggest that as part of implementing Policy DS1, the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area.

The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:

- Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.
- Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies).
- Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.

Draft Policy DS6 Sustainable Design, DS13 Movement hierarchy and DS14 Active and sustainable travel

Draft Policies DS6, DS13 and DS14 sets out the Council's commitment to making sure that new developments promote healthier lifestyles and improve overall health and wellbeing including through promoting social interaction, active design and active travel, provision of green and blue infrastructure and for design to respond to the local context. NHSPS support the inclusion of policies that support healthy lifestyles. There is a well-established connection between planning and health,

and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.

Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we recommend the inclusion of a comprehensive policy on health and wellbeing in the Local Plan, and encourage the Council to engage with the NHS on this matter ahead of the Regulation 19 document being prepared. Specific policy requirements to promote healthy developments should include:

- Proposals should consider local health outcomes, and where appropriate to the local context and/or size of the scheme include a Health Impact Assessment
- Design schemes should encourage active travel, including through providing safe and attractive walking and cycling routes, and ensuring developments are connected by these routes to local services, employment, leisure, and existing walking and cycling routes.
- Provide access to healthy foods, including through access to shops and food growing opportunities (allotments and/or providing sufficient garden space)
- Design schemes in a way that encourages social interaction, including through providing front gardens, and informal meeting spaces including street benches and neighbourhood squares and green spaces.
- Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater collection, and efficient design.
- Consider the impacts of pollution and microclimates, and design schemes to reduce any potential negative outcomes.
- Ensure development embraces and respects the context and heritage of the surrounding area.
- Provide the necessary mix of housing types and affordable housing, reflecting local needs.
- Provide sufficient and high quality green and blue spaces within developments.

Draft Policy DM7 Health and crime impact assessments

NHSPS supports the requirement for Health Impact Assessment on significant residential developments of 100 units or more.

Draft Policy W2: Whitstable Harbour (Site Allocation)

NHSPS own the freehold to Whitstable Health Centre (“the Site”) (Figure 1). Draft Policy W2 includes the Site within the broad location allocated for mixed-use development, which specifically stipulates that proposals for residential development will not be supported in advance of preparation of an SPD. We do not object to the inclusion of the Site within the broader allocation, however we request that the council review the requirement for an SPD to be in place taking into account NHS requirements should the Site become surplus to requirements in future.



Figure 1 - Site boundary of Whitstable Health Centre ("the Site")

The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area.

All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.

This need for flexibility is recognised in Policy DS10, criteria (9.). We are concerned that requiring an SPD to be in place ahead of any residential development coming forward within the wider site allocation as proposed by Policy W2: Whitstable Harbour could add unjustified delay to vital reinvestment in facilities and services for the community should the NHS in future declare the Site surplus to operational healthcare requirements.

General Comments on Evidence Base relating to Healthcare Infrastructure

The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. We recommend the Council engage with the NHS, particularly the ICB, on an on-going basis as part of preparing the Infrastructure Delivery Plan (IDP). A sound IDP must include sufficient

detail to provide clarity around the healthcare infrastructure required to support growth, and to ensure that both planning obligations and the capital allocation processes for the CIL effectively support and result in capital funding towards delivery of the required infrastructure.

Related to this, appropriate healthcare costs should be factored into the Local Plan Viability Assessment for relevant typologies. Such an approach means that developers are adequately informed in advance that they may be required to make contributions towards healthcare infrastructure. A separate cost input for health infrastructure in the plan viability assessment would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development. This is particularly important in situations where a viability assessment demonstrates that proposals are unable to fund the full range of infrastructure requirements.

Conclusion

NHSPS thank Canterbury Council for the opportunity to comment on the Draft Local Plan. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

NHSPS would be grateful to be kept informed of the progression of the Local Plan and any future consultations via our dedicated email address, town.planning@property.nhs.uk.

Yours faithfully,

Hyacinth Cabiles

Town Planner



For and on behalf of NHS Property Services Ltd