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Dear Sir / Madam,

NHS Property Services – Consultation on A City for All Londoners October 2016

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

Foreword

NHS PS 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 PS 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.

Infrastructure for people and communities

When planning for new housing, the GLA should ensure that they work with NHS commissioners and providers to ensure adequate healthcare infrastructure is provided to support new residential development.

Healthcare facilities are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The authority should therefore work with NHS

commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new housing developments are sustainable.

Building more and increasing housing supply:

Surplus public sector sites are an important source of brownfield land for housing. NHS PS is helping the government and GLA in its drive to deliver surplus public sector land for new homes. However, in some cases Local Planning Authority's (LPAs) take an inflexible approach to the release of surplus public sector land for housing.

NHS PS has experience of LPAs that have resisted the residential redevelopment of healthcare facilities that have been declared surplus to NHS requirements by commissioners. This can add significant delays to the disposal of such sites, which can lead to increased holding costs for the NHS and delay the delivery of housing.

Like other public service providers, the NHS relies in part on the sale of surplus property to help fund new and improved services and facilities. 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.

Much surplus NHS property is also 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.

As a public sector landowner within London, NHS PS supports and welcomes the Mayors intentions to 'work closely with the NHS on plans to unlock their surplus sites for housing and to enable the release of capital for reinvestment in their services.' It is also worth noting that NHS PS submitted a package of potential housing sites as part of the GLA's

call for sites for the 2016 SHLAA, and would welcome any further discussion on this matter.

NHS PS looks forward to being consulted on future strategies and plans, whilst working collaboratively with the Mayor and London Boroughs to identify surplus public sector land that is suitable for housing.

Please contact the undersigned if you wish to discuss the above further.

Yours faithfully,



William Everson | Town Planner MRTPI

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