

Our ref: N/A

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Dear Sir or Madam,

**Haringey's Local Plan – Development Management Plan Preferred Options Consultation – February 2015**

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. 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.

**Draft Policy DM58: Managing the Provision of Community Infrastructure**

Policy DM58 of the Development Management Plan (DMP) restricts development proposals that would result in the loss of a community facility. The supporting text, at paragraphs 6.1 and 6.3, includes health facilities within the Council's definition of community facilities.

The NHS requires flexibility in its estate. In particular, the disposal of unneeded or unsuitable sites and properties for best value is an important component in funding new or improved services within an area. Restrictive policies that prevent the loss or change of use of community facilities and include healthcare facilities within this definition can prevent or delay required investment in alternative facilities and work against the Council's aim of providing essential services for the community. In particular it should be noted that requirements for surplus healthcare facilities to be marketed would prevent or delay the sale of unneeded or unsuitable properties and therefore this should not be imposed.

Where it can be demonstrated that healthcare facilities would be lost or have their use changed as part of the wider NHS estate reorganisation programme it should be accepted that this provides sufficient evidence that a facility is neither needed nor viable and that adequate alternatives would be provided in accessible locations. Surplus healthcare facilities are normally purpose built and at the end of their useful lives, and can only be disposed of once the NHS's rigorous testing and approval processes have been satisfied.

NHSPS would only support Policy DM58 if it is clear that evidence of the wider NHS estate reorganisation programme would be accepted as justification for the loss of a community facility. On this basis, any such new policy or its supporting text should include the following clarification, which would also be consistent with paragraph 3.87A of the London Plan (FALP):

*The loss or change of use of existing community facilities will be acceptable if it is shown that the disposal of assets is part of a wider estate reorganisation programme to ensure the continued delivery of public services and related infrastructure, such as those being undertaken by the NHS. Evidence of such a programme will be accepted as a clear demonstration that the facility under consideration is neither needed nor viable and that adequate facilities are or will be made available to meet the ongoing needs of the local population. In such cases no accounts or marketing information will be required.*

Although no other specific amendments are suggested, it is noted Policy DM58 is unduly onerous. If a community facility is no longer required in its current use, then it would be excessive to impose further requirements. Policy DM58 should be amended on this basis, to allow redundant sites where there is no ongoing operator requirement to be considered favourably for alternative, viable uses, in accordance with the NPPF's presumption in favour of sustainable development. The Council should justify any further requirements, should it make them, with a robust, up-to-date evidence base that clearly demonstrates the local level of need for community uses and facilities.

Please do not hesitate to contact me if you wish to discuss any of these matters further.

Yours faithfully,

William Everson  
Planner London Region