

**NHSPS Response to Matter 9, Question 7 and 8:**

**Qu.7 Are the proposed allocations and the associated development requirements identified in Chapter 12 of the Plan – justified, effective, consistent with national policy and in general conformity with the London Plan?**

**Qu. 8 Are any modifications required to ensure that the individual site allocations and/or their development requirements identified in Chapter 12 of the Plan are accurate and sound?**

1. This response follows a representation submitted at Regulation 19 stage and to Post Hearing Note EX57 – Post Stage 1 Hearings, in which NHSPS sought modifications to Site Allocation 101.
2. Site Allocation 101- The Brentford Group Practice sets out the development details including with regard to ‘Movement and Access’ and the ‘Site Requirements’.
3. The changes proposed under Suggested Modification code HLP\_SA101\_0\_1 (Post Stage 1 Hearings Version of the Schedule of Suggested Modifications) partly addresses the modifications sought at Regulation 19 and provides clarity. However, following further review, NHSPS do not consider the approach for the site allocation to be effective for the purposes of the development requirements - ‘Movement and Access’ and ‘Site Requirements’.
4. The requirements for health commissioning and the form of any health provision are a decision for local health commissioners and should not be constrained by planning policy. In planning for health and social care facilities, Policy S2 of the London Plan sets out the clear need to work with the NHS in identifying local health needs in line with the relevant estate strategies and plans, and further understanding how this can be consolidated to address current and future health infrastructure needs. As the policy highlights the need to identify opportunities to make better use of existing infrastructure, including through facilitating opportunities for co-location or reconfiguration, there is a clear need to ensure these primarily address identified local health needs and align with the relevant NHS estate plans.
5. As part of working with the NHS to achieve the aims of Policy S2 of the London Plan, NHSPS requests the following modifications to ensure the Local Plan is positively prepared and effective in setting out the development requirements for Site Allocation 101.
6. Under the ‘Movement and Access’ section of the proposed allocation we request the reference to residential and commercial elements of the development are to be clearly separated is revised to clarify that integration/co-location of these uses may be possible subject to demonstrating an acceptable design response and satisfying other policy requirements, and following engagement with the relevant ICB.
7. Under the ‘Site Requirements’ section, NHSPS request the allocation is amended to remove the minimum development quantum of 3,690 sqm of health floorspace, instead state that ‘the health floorspace requirement is to be determined by the NHS as part of any future application for comprehensive redevelopment’.
8. The NHS needs to retain the flexibility to implement its health commissioning strategy (at pace) to meet the needs of the population at any time and consider modifications to be necessary to ensure effective implementation of Site Allocation 101.



**Property Services**

Word count: 434 words