

Barnet Draft Local Plan Regulation 19

We welcome the changes made in response to the CCG's comments on the Regulation 18 draft version of the plan. The latest version highlights the strong relationship between health and planning and recognises the impact of COVID19. The draft plan now clearly identifies the relationship between objectives and policies, particularly in relation to health and wellbeing with the amendments to Table 2.

These comments suggest further changes to the draft Plan and endorse the representations submitted by NHS Property Services.

Barnet's Growth Requirements

We note that Table 5 has been amended to identify housing supply in each of the six Growth Areas. This is welcomed, and the CCG will continue to work with the Council to review healthcare infrastructure requirements in the Growth Areas, particularly Edgware Town Centre and Cricklewood.

The CCG has contributed to the draft Infrastructure Delivery Plan (June 2021) which will need to be kept under review to ensure that it aligns with the NHS North Central London Estates Strategy and estate priorities in Barnet and the health and care locality planning work already underway.

Policy HOU01 Affordable housing

We welcome the changes the Policy HOU01 Affordable housing which support approaches to secure housing for critical key workers on land owned by Government departments and agencies. We note that the fifth paragraph of the policy refers to critical key workers in the context of school attendance during the COVID-19 crisis. We suggest that this is replaced with a reference to Annex 2 of the National Planning Policy Framework which defines 'essential local workers'. This includes NHS staff.

We note that paragraph 5.4.9 refers to the London Plan requirement for at least 50% affordable housing on public sector land. We suggest that the paragraph also states that public sector land represents an opportunity to deliver homes that can meet the needs of essential workers, such as those working in health, fire, police, transport and support services. This is reflected in a recent permission for residential accommodation for NHS staff/healthcare workers on land owned by the NHS adjacent to Finchley Memorial Hospital (20/4343/OUT) where a nomination approach was agreed to meet an identified housing need for homes for NHS staff.

Policy CHW02 Promoting health and wellbeing

We support the changes to Policy CHW02 Promoting health and wellbeing which now provides a comprehensive policy framework to support health and wellbeing. In particular, the policy now supports the use of developer contributions for healthcare infrastructure. The policy now clarifies the role of Health Impact Assessments (HIAs) on larger developments by providing

definitions in the glossary. We suggest that further guidance on HIAs is provided in updated Information Requirements for the Validation of Planning Applications including the use of HIA tools and a recommended process to ensure that HIAs are effective.

Policy CHW01 Community Infrastructure

We welcome Policy CHW01 Community Infrastructure and the support for new community infrastructure. However, when considering the redevelopment or disposal of surplus NHS sites we consider that the policy should be sufficiently flexible to allow the loss of a facility, or part disposal of a site, where declared surplus to requirements in accordance with service transformation and estate strategies. The redevelopment of NHS sites and the introduction of housing and other uses provides vital investment to re-invest in new and improved health facilities which are fit for purpose. This flexibility would accord with clauses F and G of London Plan Policy S1.

Therefore, we suggest that a third bullet is added to read: [or] “the loss, or partial loss of a facility or site in community use is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities.”

Policy ECC01 Mitigating Climate Change

We support Policy ECC01 Mitigating Climate Change. The NHS is committed to reaching ‘net zero’ carbon by 2040 and an 80% reduction in emissions by 2028 to 2032. The report ‘Delivering a Net Zero National Health Service’ (January 2020) sets out interventions which will help the NHS decarbonise, including action to reduce emissions from the NHS estate, a move towards a sustainable model of healthcare with care closer to home, promoting less polluting travel options and preventing ill health which reduces hospital admissions.

Annex 1 – Schedule of Site Proposals

The CCG has reviewed the Schedule of Site Proposals in Annex 1. The proposals include NHS sites and sites in different ownership where a new healthcare use is required. This is in addition to new healthcare facilities already planned in Brent Cross Growth Area (Policy GSS02) and Colindale Growth Area (Policy GSS06). We also note that the Council will prepare a more detailed planning framework for Cricklewood Growth Area (Policy GSS04) and we would welcome the opportunity to review healthcare infrastructure requirements in this area.

We note the representation from NHS Property Services clarifying the ownership of the Brunswick Park Health Centre as part of Site No.4 Osidge Library and Health Centre and support the suggested change to remove the unnecessarily prescriptive allocation of floorspace (50%) for a replacement library and health centre use. The Council and NHS are exploring options for the site and decisions regarding future healthcare requirements will be taken in accordance with NHS service and estate strategies.

We note the representation submitted by Montagu Evans on behalf of NHS Property Services for Site No. 5 Edgware hospital. We support the suggested change to remove the unnecessarily prescriptive allocation of floorspace (75%) to be retained for hospital use. Flexibility is required to take account of future service requirements and the aim to optimise the use of the current site.

A number of sites are allocated for community use in the schedule. We note that community use can cover a wide range of uses as defined in paragraph 8.2.1 of the draft plan, including healthcare. We support the proposed community use on Site No.27 Edgware Town Centre, but suggest that community use could be added as a proposed non-residential use to Site No.28 Edgware Underground & Bus Stations as the CCG is exploring options for new health facility in Edgware Growth Area.

We note that there are eight site allocations in Hendon / The Burroughs area (nos 34-42). The CCG has been in discussion with the Council regarding the potential for health use as part of Hendon Hub proposals and support the proposed community use allocated on the Meritage Centre site (Site no 40).