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(21/12/2022)

Dear Penzance Town Council,

### **Penzance Neighbourhood Plan Submission Draft**

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, modern healthcare and working environments. NHSPS 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.

#### **Overview**

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS support NHS commissioners to deliver a local health and public estate that can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.

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 allowed to develop, modernise or be protected in line with integrated NHS strategies. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Our comments on the policies set out within the Neighbourhood Plan are as follows.

### Policy H12 (site allocation HOU7)

Site allocation HOU7 covers Bellair Health Office. Policy H12 sets the following additional criteria for site allocation PZ-H1/HOU7:

- *With easy pedestrian access to the town centre, this should be a car free development and/or supported by a car club arrangement.*
- *Provision should be made within the development for dedicated, affordable key worker housing.*

NHSPS supports the inclusion of Bellair Health Office as a site allocation but request flexibility in the development requirements of Policy H12; specifically the requirement for the development to be car free.

### Context

NHSPS own the freehold to Bellair Health Office, and a copy of the title plan for the property is shown in Figure 1 below.

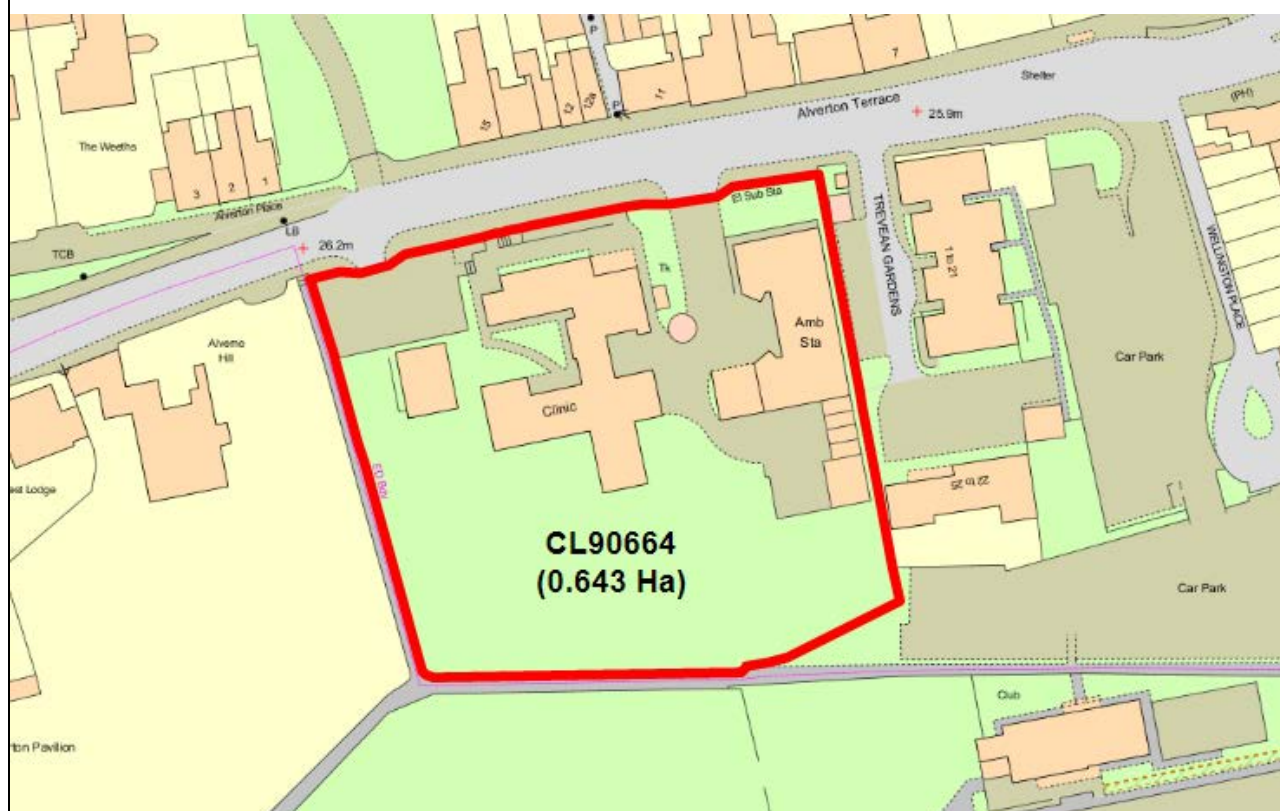


Figure 1: Bellair Health Office and Ambulance Station

Although we support the in-principle allocation of the redevelopment of the site, the requirement for the development to be car free and/or supported by a car club arrangement, could work against the NHS's ability to effectively manage its estate. A requirement for a wholly car free development would work to restrict residential development options on the site, and therefore could delay housing coming forward on this sustainable, previously developed site.

We therefore suggest that the wording of Site Allocation H12/HOU7 be amended to provide flexibility in the management of the NHS estate.

<b>Amended Wording</b>
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| <ul style="list-style-type: none"><li>• With easy pedestrian access to the town centre, <del>this should be a car free</del> development <b>should look to minimise parking levels</b> and/or supported by a car club arrangement.</li></ul> |
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NHSPS thanks Penzance Town Council for the opportunity to comment on the Submission Draft Neighbourhood Plan and hopes the proposed amendments to Policy H12/HOU7 are considered constructive and helpful. We look forward to reviewing future iterations of the plan and receiving confirmation that these representations have been received. Should you have any queries or require any further information on the enclosed, please don't hesitate to contact me.

Yours sincerely,

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