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12 February 2025

BY ONLINE SUBMISSION ONLY

RE: Consultation on Stapleford and Great Shelford Neighbourhood Plan – Submission (Regulation 16)

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS) for and on behalf of Cambridgeshire & Peterborough Integrated Care System (C&P ICS).

Foreword

Cambridgeshire & Peterborough Integrated Care System (C&P ICS) is working together to improve the health and wellbeing of our local people throughout their lives. We bring together health and care organisations, as well as local councils, alongside Voluntary, Community and Social Enterprise (VCSE) sector organisations to make a real difference to the lives of local people and communities.

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with Cambridgeshire & Peterborough Integrated Care System (C&P ICS) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

Our detailed comments on the Neighbourhood Plan are summarised below.

Draft Policy S&GS 17: Delivering Community Infrastructure Priorities Alongside New Development

Draft Policy S&GS 17 sets out the overarching policy to ensure new developments positively contribute to sustainable growth in the local area through the provision of new and improved community infrastructure, in line with local priorities. We welcome supporting paragraph 9.6 which states new development must address arising needs for specific infrastructure, including for healthcare. Health infrastructure is clearly identified as a priority, with an expectation that



development proposals must make provision to meet healthcare infrastructure costs made necessary by the development.

Supporting paragraphs 9.19 to 9.22 sets out the Council's assumptions on the growth in demand for healthcare infrastructure in the local area, partly through the use of proxy data (Paragraph 9.19). NHSPS are supportive of the work the Council has undertaken thus far in exploring options to mitigate impact on healthcare infrastructure based on forms of population growth assumptions. In line with our previous response at Regulation 14 Stage (April 2024) however, we continue to recommend that the Council engage with Cambridgeshire and Peterborough ICS (C&P ICS) to ensure the most appropriate and suitable form of mitigation is identified in the area.

Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be emphasised that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures.

Shelford Health Centre

NHSPS own the freehold to Shelford Health Centre ("the Site"), a site map of this is attached in Appendix 1.

We note that the Council has undertaken an exercise in exploring options for the Site's redevelopment within supporting paragraph 9.23. In line with the above, any quantum or retained and/or re-provided health or other community uses would need to be determined by the local health commissioners (the Integrated Care Board) – including that required for continued health services, and any part of the Site which may no longer be needed for the delivery of health services (and therefore available for alternative uses).

Local health commissioners are best placed to determine the means and form of mitigation to meet the healthcare needs of the local community, including when considering the expansion of facilities to increase the level of provision. As such, we recommend the Council engage in consultation with the ICB when determining forms of healthcare infrastructure provision.

Conclusion

NHSPS thank Stapleford and Great Shelford Parish Councils for the opportunity to comment on the Regulation 16 Draft. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

NHSPS would be grateful to be kept informed of the progression of the Local Plan and any future consultations via our dedicated email address, <u>town.planning@property.nhs.uk</u>.

Yours faithfully,

Hyacynth Cabiles



Graduate Town Planner

For and on behalf of NHS Cambridgeshire and Peterborough ICS



Appendix 1 – Shelford Health Centre Site Plan

