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8 October 2021

Dear Sir/Madam,

Bath and North East Somerset Council: Local Plan Partial Update Publication (Regulation 19)

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 and modernise in line with health commissioning 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 draft Local Plan Partial Update are in relation to St Martins Hospital, and Draft Policy SB25. Our comments in relation to this site are as follows.

Our Representations

Policy SB25 St Martins Hospital

Site allocation SB25 relates to St Martins Hospital. NHSPS own the freehold of the St Martins Hospital site as identified in Figure 1 below, outlined in red (hereafter the “Site”).

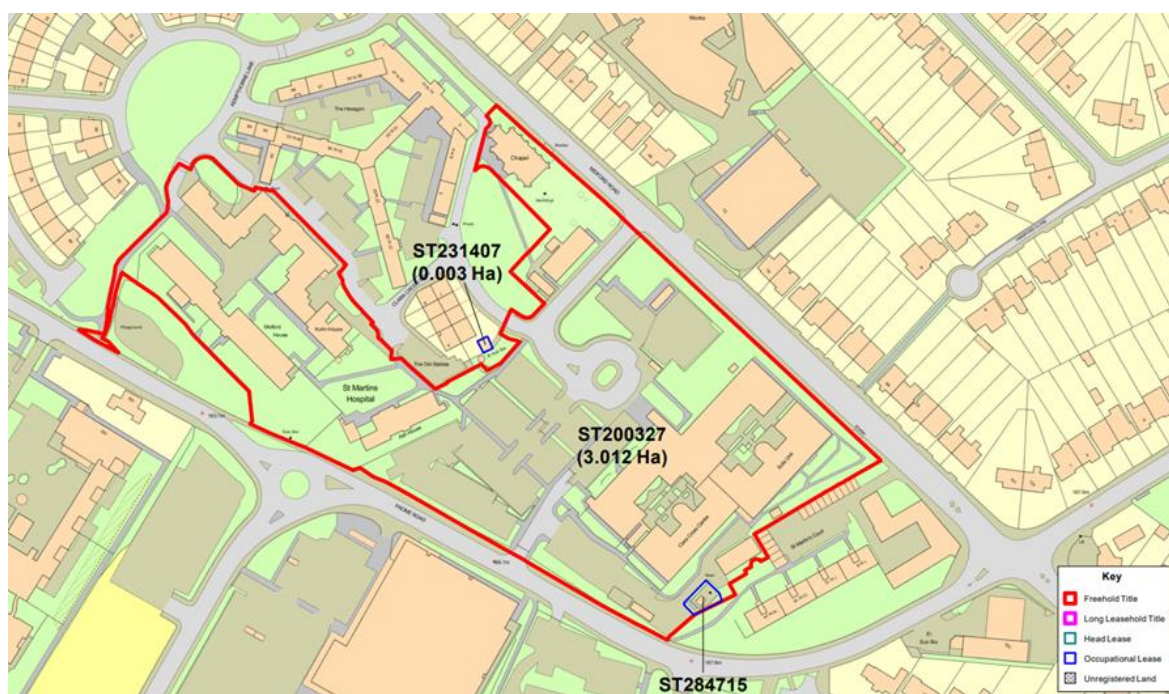


Figure 1: NHSPS Ownership Plan

Draft Policy SB25 set out the Council’s vision for the future redevelopment of the Site. Although we support the in-principle allocation of the Site, we request some amendments to the wording and policy requirements to ensure the site can be brought forward in a timely manner.

These proposed amendments, along with our narrative for requesting these changes, are set out in Table 1 below. New text is shown in **red**, with deleted text shown in ~~strikethrough~~.

Table 1: Policy SB25 Proposed Amendments

Policy Paragraph	Current wording	Proposed wording	NHSPS Narrative
SB25 Policy Wording Paragraph 1 (Page 157)	Development proposals will: Ensure a comprehensive mix of uses across the site, comprising the delivery of around 50 residential dwellings, and the continued use of the south eastern section of the site for clinical health services. Any application for the conversion or redevelopment of buildings within the site to non-clinical uses shall be supported by evidence to show that they have been formally declared as surplus to the operational healthcare requirements of the NHS by local health commissioners.	Development proposals will: Ensure a comprehensive mix of uses across the site, comprising the delivery of around 50 60 residential dwellings, and the continued use of the south eastern section of the site for clinical health services (subject to health commissioning requirements). Any application for the conversion or redevelopment of buildings within the site to non-clinical uses shall be supported by evidence to show that they have been formally declared as surplus to the operational healthcare requirements of the NHS by local health commissioners.	NHSPS respectfully requests an amendment to the proposed policy wording to ensure an appropriate development capacity is achievable and ensure that we are able to make the optimum use of the brownfield site and bring forward a viable scheme. This amended unit capacity will be supported by additional design and capacity information and justification before the next consultation phase Additional text is proposed to provide appropriate flexibility, where health service requirements must be guided by local healthcare commissioners. Any loss of health provision at the Site will be subject to the requirements set out in paragraph 1, which ensures that a loss of healthcare provision is supported by appropriate evidence.
Supporting Text Paragraph 220q (Page 157)	The site will deliver around 50 new dwellings, whilst continuing to provide important clinical health care provision within parts of the site.	The site will deliver around 50 60 new dwellings, whilst continuing to provide important clinical health care provision within parts of the site (subject to health commissioning requirements).	In conformity with the above suggested changes (policy wording paragraph 1)
SB25 Policy Wording Paragraph 2 (Page 158)	Achieve the delivery of residential dwellings through the conversion of Kempthorne House, Midford House and Ash House, and the redevelopment of Frome House. Any scheme should be informed by a detailed, site-wide heritage assessment, which considers each of the individual buildings within the site, their context and relationship to each other, as well as other heritage assets, including the World Heritage Site, adjacent listed buildings, and undesignated heritage assets. The proposed subdivision and alteration of the buildings, and the design and layout of external areas shall be informed by this heritage assessment.	No changes proposed	No changes proposed
SB25 Policy Wording Paragraph 3 (Page 158)	Deliver high quality architectural design in relation to both conversion and redevelopment, informed by the site's sensitive historic surroundings.	No changes proposed	No changes proposed
SB25 Policy Wording Paragraph 4 (Page 158)	Retain and convert Kempthorne House, Midford House and Ash House, unless an objective and comprehensive heritage assessment is provided to justify demolition, with a clear evidence base to demonstrate that conversion is not feasible and / or viable.	No changes proposed	No changes proposed
SB25 Policy Wording Paragraph 5 (Page 158)	Ensure that any residential use is developed using a comprehensive, site wide approach, ensuring the existing and future clinical operations within the site continue to function effectively, particularly in relation to access and car parking arrangements.	Ensure that any residential use is developed using a comprehensive, site wide approach, ensuring the existing and future clinical operations (subject to health commissioning requirements) within the site continue to function effectively, particularly in relation to access and car parking arrangements.	As set out above, it is essential that NHS assets are appropriately managed in accordance with NHS commissioning requirements. Therefore additional wording has been added to ensure appropriate flexibility.

<p>SB25 Policy Wording Paragraph 6 (Page 158)</p>	<p>Protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, planting, and landscaped areas. Protect all retained connecting habitats from increased light spill. Any extension or redevelopment of existing buildings will be designed to ensure minimal to no encroachment into landscaped areas.</p>	<p>Protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, planting, and landscaped areas as appropriate. Any loss of existing landscape infrastructure and habitats will be appropriately justified via a comprehensive Ecological Assessment including identification of any suitable mitigation measures. Protect all retained connecting habitats from increased light spill, and identify any appropriate mitigation options. Any extension or redevelopment of existing buildings will be designed to ensure minimal to no encroachment into landscaped areas.</p>	<p>NHSPS will in principle seek to retain existing landscape infrastructure and habitats on the Site and avoid any impact where possible. However it should be accepted that in order to bring forward development at the Site, some changes to the existing landscaping may be required. These potential changes will remain unknown until a later stage in the design development of the Site. As a result appropriate flexibility is requested in order to allow for amendments to the existing landscaping and habitats as required. It is accepted that any changes should be accompanied by relevant survey information and appropriate justification and mitigation as required.</p> <p>In relation to light spill, the above sentiments are reflected in that any change to the existing uses on site may have an impact on existing light spill levels. Whether or not this is the case cannot be determined until a later date in the design stage, but the wording of Policy SB25 should provide appropriate flexibility in order to allow for any negative impacts to be appropriately mitigated, and to ensure redevelopment of the Site is not subject to unduly restrictive policy which could prevent the Site being brought forward in a timely manner.</p> <p>The final sentence in this section is not necessary, where it duplicates the first part of this paragraph. These matters will all be appropriately assessed as part of the any future planning application, once detailed design proposals have been developed including necessary supporting information and justification.</p>
<p>SB25 Policy Wording Paragraph 7 (Page 158)</p>	<p>Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a . Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed.</p>	<p>No changes proposed</p>	<p>No changes proposed</p>
<p>SB25 Policy Wording Paragraph 8 (Page 158)</p>	<p>Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs.</p>	<p>Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs.</p>	<p>This requirement is considered premature and overly onerous at this stage, in the absence of a detailed assessment of existing Ecological features, and without any details on the final design and form of the residential units on site. This also duplicates paragraph 6 above (with amendments). It is considered that the commitment to undertake a suitable ecological assessment, and to use this as the basis for identifying appropriate mitigation is sufficient at this stage.</p>
<p>SB25 Policy Wording Paragraph 9 (Page 159)</p>	<p>Retain and enhance the existing network of pedestrian footways throughout the site and deliver measures to improve permeability and legibility for pedestrians and cyclists, including publicly accessible routes joining Midford Road and Frome Road. Ensure that such improvements are designed to respect the landscape and habitat infrastructure or heritage of the site.</p>	<p>No changes proposed</p>	<p>No changes proposed</p>
<p>SB25 Policy Wording Paragraph 10 (Page 159)</p>	<p>Undertake Transport Assessment for the development proposals to understand potential traffic impacts on the existing network, and scope of mitigation. This must focus on the delivery of sustainable transport measures to provide opportunities for mode shift.</p>	<p>No changes proposed</p>	<p>No changes proposed</p>
<p>SB25 Policy Wording Paragraph 11 (Page 159)</p>	<p>Examine the pedestrian and cycle routes between the site and key local facilities and make appropriate enhancements to ensure that the walking and cycling are the natural choice for local trips. This should include, but not be limited to: a. Improve access to Odd Down Sports Ground for pedestrians and cyclists through off-site contributions towards crossing improvements across Wellsway, and a new access to the Sports Ground;</p>	<p>Examine the pedestrian and cycle routes between the site and key local facilities and make appropriate enhancements to ensure that the walking and cycling are the natural choice for local trips. This should include, but not be limited to: a. Improve access to Odd Down Sports Ground for pedestrians and cyclists through off-site contributions</p>	<p>The specific requirements outlined in this paragraph are considered overly onerous and premature at this stage in the absence of more detailed design and assessment work. Paragraph 10 (above) commits NHSPS to undertaking a full Transport Assessment which will include identifying a scope of mitigation. Potential mitigation measures can all be examined as part of a future planning application once more detail is available.</p>

	<ul style="list-style-type: none"> b. Upgrade to crossing over Frome Road at the entrance to Fosseway Infant and Primary School to include widening to accommodate shared pedestrian/cycle use; c. Midford Road cycle improvements between, and including, Clara Cross Lane and Path to Hansford Close; and d. Enhancements to Midford Road/A367 junction to improve road safety and sustainable accessibility. 	<p>towards crossing improvements across Wellsway, and a new access to the Sports Ground;</p> <ul style="list-style-type: none"> b. Upgrade to crossing over Frome Road at the entrance to Fosseway Infant and Primary School to include widening to accommodate shared pedestrian/cycle use; c. Midford Road cycle improvements between, and including, Clara Cross Lane and Path to Hansford Close; and d. Enhancements to Midford Road/A367 junction to improve road safety and sustainable accessibility. 	
SB25 Policy Wording Paragraph 12 (Page 159)	Parking for bicycles and cars will need to be provided in line with current parking standards, for both residential and clinical uses. Improved integrated parking solutions and car park management across the site should be investigated to maximise efficient use of land.	No changes proposed	No changes proposed
SB25 Policy Wording Paragraph 13 (Page 160)	Evaluate the potential for archaeological remains across the development site and ensure appropriate mitigation where required.	No changes proposed	No changes proposed

Summary

NHSPS thank B&NES Council for the opportunity to comment on this Regulation 19 consultation document, and hopes the proposed amendments are considered constructive and helpful.

NHSPS look forward to 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 using the information below.

Yours sincerely,

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