



Property Services

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BY EMAIL ONLY

RE: Publication Draft Bootle AAP Consultation

Thank you for the opportunity to comment on the above document. The following representations are submitted by Cheshire and Merseyside Integrated Care Board (ICB) and NHS Property Services (NHSPS).

Background

Cheshire and Merseyside ICB commissions (plans, designs and purchases) many of the health services that local people use, including medicines, hospital care, urgent and emergency services, mental health care, GP services, Community Pharmacy, dentistry and general ophthalmology (eye care services) and many community services.

NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC). 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 local NHS Integrated Care Boards (ICBs) 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.

Bootle context

Bootle has significant gaps in health status and life expectancy between the most and least deprived areas. The core demographic is dominated by low-income, young to middle aged individuals and families. These residents have low levels of disposable incomes and are likely to be hit the hardest by the current cost of living crisis. Average earnings are significantly below the national average in some areas, and contribute to and compound, a number of issues including food and fuel poverty and poor mental health and wellbeing.

The area also has an ageing population and issues of frailty and dementia amongst elderly population. There is a notable component of older people living with health and wealth deprivation.

Within Sefton there are significant variation of issues across the Borough ranging from concerns relating to vulnerable 'older people' in the North and challenges relating to a younger population structure in the South, with a different set of challenges relating to health-related behaviours as well

as child health and sexual health implications. It is significant to note that one in six children in Sefton are living in relative poverty. Community development and preventive approaches are therefore vital.

Consultation response

We note that the Bootle Area Action Plan will form part of a suite of policy documents for Sefton Council once adopted. We are concerned however that at present, the Action Plan does not refer to securing developer contributions towards healthcare infrastructure, and therefore there is a policy vacuum on this matter.

We acknowledge that there is a policy in the Area Action Plan dedicated to health at Policy BAAP10 Healthy Bootle. The policy as currently worded is comprehensive and covers a range of land uses that have a bearing on health and wellbeing. The policy also provides a requirement for Health Impact Assessments for developments over 30 dwellings, which provides a process to consider health at the planning application stage.

Notwithstanding these positive aspects, part viii) of the AAP is not effective at present the policy is opaque and omits any reference to the role of developer contributions in healthcare infrastructure provision. Healthcare infrastructure should be delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development.

We therefore propose the following modification to ensure that the AAP is effective and consistent with national planning policy (NPPF paragraph 55) in mitigating the impacts of development where otherwise unacceptable development would result:

Amend Policy BAAP10 part viii) to:

viii. Supporting in principle the provision of public health facilities (subject to other BAAP and Local Plan policies) and securing developer contributions towards meeting the healthcare infrastructure and, or mitigation needs arising from development.

It should be stated that the delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development - access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

It is important to acknowledge that Sefton forms part of the wider Liverpool City Region Combined Authority area. Policy LCR DP9 Part a) of the emerging Spatial Development Strategy sets out the principle of securing developer contributions towards infrastructure, which once adopted will apply across the region and therefore planning guidance at the local authority level will be required to implement this overarching policy.

NHS Property Services are working in conjunction with the Cheshire and Merseyside Integrated Care Board (ICB) to develop a consistent approach to developer contributions and emerging planning policies across the region. We would welcome the opportunity to work together to develop policy guidance to better support healthcare infrastructure provision and in securing developer contributions. This is critical given that the Sefton Council do not have a Community Infrastructure

Levy in place or plans to introduce one. Further to this, background research indicates that the Council historically have not obtained S106 contributions towards healthcare. Therefore, developing a stronger policy basis across a range of policy documents would be beneficial in facilitating this in the future.

Conclusion

NHSPS thank Sefton Council for the opportunity to comment on the Publication Draft Bootle AAP Consultation and trust our comments will be taken into consideration. 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 Area Action Plan and any future consultations via our dedicated email address, [REDACTED].

Yours faithfully,

Laura Allen
Associate Town Planner

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For and on behalf of NHS Property Services Ltd
