

Representor ID: 470
Comment ID: 1

NHSPS Response to Matter 6 Question 4:**4. Is Policy SC3 consistent with national policy and in general conformity with the London Plan?**

1. This response follows a representation submitted at Regulation 19 stage, in which NHSPS sought modifications to Policy SC3.
2. The Council's response to Policy SC3 within their Regulation 22 (1)(c) Consultation Statement (October 2025) addresses the changes requested by NHSPS at Regulation 19 stage. The Council notes that a level of flexibility is provided and the changes requested are captured within supporting paragraph 10.57 which allows for the demonstration of the loss of a facility as being part of a wider strategy or is evidenced as being underused or no longer fit for purpose.
3. Following further review, NHSPS consider Policy SC3 as being in general conformity with the London Plan – Policy S2; this is given that it will be supplemented by the details within paragraph 10.57 in relation to the evidence to be considered in relation to the loss of an existing facility.
4. We therefore consider the approach to be effective for the purposes of Policy SC3, where it is clearly supported by supporting paragraph 10.57. The requirements for health commissioning and the form of any health provision are a decision for local health commissioners and should not be constrained by planning policy.
5. NHSPS would request that it is continued to make clear that the demonstration of the loss of a facility as part of a wider strategy or evidenced as being underused or no longer fit for purpose, would be considered acceptable by the Council within supporting paragraphs. This should include consideration of the acceptability of the existing NHS disposal process currently in place in declaring surplus sites as part of a wider estates strategy or transformation plan.
6. The NHS needs to retain the flexibility to implement its health commissioning strategy (at pace) to meet the needs of the population at any time and consider the above request to be necessary to ensure effective implementation of Policy SC3 in respect of health care provision.

Word count: 320 words
