

Planning Policy

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21st October 2024

Dear Sir/ Madam,

**Epping Town Council Neighbourhood Plan Regulation 16 Publication –
Representations on behalf of Princess Alexandra Hospital NHS Trust**

- 1. On behalf of our client, Princess Alexandra Hospital NHS Trust (PAHT), we hereby submit representations in response to the Epping Town Council Neighbourhood Plan Submission Draft (Regulation 16) consultation, published in August 2024. These representations should be read alongside those submitted by Hertfordshire and West Essex Integrated Care Board (HWE ICB).

Summary

- 2. These representations **object** to the Epping Neighbourhood Plan, as currently drafted, and seek amendments to it to ensure that it provides an appropriately supportive planning policy basis for achieving PAHT’s ambitions for provision of enhanced healthcare facilities and services at St Margaret’s Hospital and elsewhere within its catchment area.
- 3. Please note that the Neighbourhood Plan as currently drafted does not represent a suitable position in respect of healthcare plans for acute based services, in so far as it should reflect the healthcare strategy for the area produced by the Hertfordshire and West Essex Integrated Care Board (HWE ICB), including PAHT’s investment plans and should not seek to impose alternative healthcare policies that would be beyond the remit of the draft plan and relevant Local Planning Authority. Therefore, the Plan requires amendment as identified in these representations in order to meet the ‘basic conditions’ set out in Planning Legislation referred to below.

Background

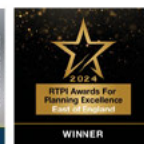
- 4. St Margaret’s Community Hospital is mainly owned by NHS Property Services, and part of the site is managed and operated by PAHT, who provide a range of acute hospital and community services for Epping, Harlow, and Bishops Stortford.

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5. The Trust is, and will be, making significant investment at St Margaret's Hospital to provide increased, more efficient and more cost-effective healthcare services to improve the level of care and experience for the existing and future catchment population.
6. An example of this is the recent grant of planning permission for a Community Diagnostic Centre (CDC) at St Margaret's Hospital in July 2024, construction of which is due to commence in November 2024. Once implemented, the CDC will significantly improve the experience for patients accessing diagnostic services, enabling patients in the community to be seen more quickly and closer to their homes, with more options for appointment times that are convenient for them. The new CDC will operate over extended opening times and will accommodate additional equipment, including:
 - ❖ Two additional computerised tomography (CT) scanners;
 - ❖ Extended hours for X-rays;
 - ❖ New ultrasound equipment;
 - ❖ New cardiology equipment;
 - ❖ New respiratory equipment;
 - ❖ Relocated MRI scanner; and,
 - ❖ More phlebotomists to be recruited, increasing the number of blood tests that can be carried out.
7. In order to achieve PAHT's ambitions for provision of enhanced healthcare facilities and services at St Margaret's Hospital and elsewhere within its catchment area, it is essential that an appropriately supportive planning policy context is in place. The representations below seek to secure a supportive planning policy context within the Epping Neighbourhood Plan.

PAH's Representations – Draft Neighbourhood Plan

8. The following representations have been informed by a review of the draft Neighbourhood Plan against the 'basic conditions' for such plans set out at Section 8(2) of Schedule 4B to the Town and Country Planning Act 1990, the National Planning Policy Framework (December 2023), and the adopted Epping Forest District Local Plan (2023).

Draft Policy 13: Enhancing Social, Sporting, Play, Cultural and Community Facilities

9. It is noted that the supporting text to draft Policy 13 refers to a risk of community facilities being 'lost' due to their replacements being located in other towns. The proposed replacement of Princess Alexandra Hospital is cited as an example, with the location of the re-provided hospital identified as being in Harlow (paragraph 9.2).
10. It should be noted that the proposed location for the replacement Princess Alexandra Hospital would be within the Harlow and Gilston Garden Town area and, therefore, may not be confined to Harlow itself, although it will cover its wider catchment area including Epping.

11. Draft Policy 13 requires replacements for ‘lost’ community facilities to be located within the Parish and to be of an equivalent size as the facility being replaced. This requirement would be contrary to the NPPF, which states that planning policies and decisions need to take account of local strategies to improve health and well-being for all sections of the community (paragraph 97).
12. In addition, this requirement would be contrary to Policy D2 of the Epping Forest District Local Plan (2023), which requires replacement services or facilities to be provided in an appropriate alternative location that is accessible to local residents affected by the loss. Accordingly, this requirement would not meet the ‘basic conditions’ for neighbourhood plans, as it would not have regard to national policies and advice and would not be in general conformity with the strategic policies contained in the relevant development plan.
13. The provision of replacement healthcare facilities within the Parish may not align with PAHT’s strategy for future healthcare provision, which needs to be predicated on achieving the best possible health outcomes for the population while providing a cost-effective and efficient service. Restricting provision to within the Parish could jeopardise delivery of this strategy and, therefore, flexibility needs to be built into the policy wording to ensure that it represents an appropriate strategy for securing sustainable development (as required by basic condition (d)).
14. Similarly, the use of equal sized premises for replacement healthcare facilities may not meet PAHT’s objective of providing cost-effective, financially efficient and sustainable services.
15. The draft policy’s support for *“the provision of additional much-needed health-hub for Epping comprising GP and community nursing care services”* would need to be informed by liaison with the Hertfordshire and West Essex Integrated Care Board (HWE ICB) who is responsible for planning, commissioning and co-ordinating healthcare services in the local area. It is not within the Town Council’s or District Council’s remit to determine what healthcare services and facilities should be provided by the Health Authority and at what premises.
16. The supporting text to this part of Policy 13 states that *“any future development of the St Margaret’s Hospital site needs to be phased in relation to a new hospital at Harlow and the commitment, with site and funding secured for a health hub to serve the future needs of the Epping community”* (paragraph 9.5). This assertion would also be contrary to the NPPF’s requirement for planning policies and decisions to take account of local strategies to improve health and well-being for all sections of the community (paragraph 97).
17. Notwithstanding what is said in the draft Neighbourhood Plan, proposals for new and/ or enhanced facilities at St Margaret’s Hospital are not dependent on the proposals for replacing Princess Alexandra Hospital within the Harlow and Gilston Garden Town area, or on any proposals for future primary healthcare facilities and services, which will need to be confirmed by HWE ICB. As such, it is inappropriate for the draft Plan to impose a requirement for the relevant health providers to predicate their strategies for future healthcare provision on planning policy requirements rather than healthcare delivery policies.
18. In light of the above, it is requested that the following amendments are made to ensure the draft Plan meets basic condition (a) - having regard to national policies and advice and (d) contributing to achieving sustainable development:

- ❖ Paragraph 9.2 – “... for instance a ~~new hospital~~ **replacement Princess Alexandra Hospital** is planned ~~at~~ **within the Harlow and Gilston Garden Town area**”.
- ❖ Policy 13 – “Where there is a proposal for the loss of sporting, social, cultural, play and community facilities, this will only be acceptable where a replacement facility of ~~equivalent size, quality and convenience~~ **that will serve existing and future communities in Epping** ~~within the Parish for example the library and St. Margaret’s diagnostic centre, in line with the EFDC Policies and any replacement policy document~~”.
- ❖ Paragraph 9.5 – “Any future development of the St Margaret’s Hospital site needs to be phased in relation to a new hospital at Harlow and the commitment, with site and funding secured for a health hub to serve the future needs of the Epping community. A health hub would typically include GP services, community health services, podiatry, x ray and diagnostic services and drop-in blood tests – as well as the existing maternity and post natal services that are based there”.

19. We understand that changes to the first bullet point within Policy 13 are proposed within the representations submitted by HWE ICB to ensure the policy better reflects the strategy for future healthcare infrastructure and service provision within the locality.

Action Plan (Paragraph 13.4)

20. It is noted that the draft Neighbourhood Plan’s ‘Action Plan’ contains an action to “*negotiate with Health Trust re. a new ‘health hub’ providing integrated GP/ pharmacy/ community health/ other health services such as chiropody and opticians/ GP/ sexual health at St Margaret’s Hospital (policies 3, 7 and 14)*”

21. As discussed above, it is not within the Town Council’s or District Council’s remit to determine what healthcare services and facilities should be provided by the Health Authority and at what premises. As such, the identified action is considered to be inappropriately prescriptive and contrary to the NPPF in that it does not take account of local strategies to improve health and well-being for all sections of the community, which would be progressed by PAHT in conjunction with HWE ICB.

22. In light of the above, it is requested that the action is amended as follows:

*“Negotiate with Health Trust re. a new ‘health hub’ providing integrated GP/ pharmacy/ community health/ other health services such as chiropody and opticians/ GP/ sexual health at St Margaret’s Hospital (policies 3, 7 and 14) **Delivery of health infrastructure to support policies 3, 7 and 14, where there is an identified need**”.*

Map 1: Proposals Map for Epping Parish

23. The Proposals Map appears to show provision of a new car park within the St Margaret’s Hospital site. However, this is not mentioned in Policy 7 or its supporting text. As such, it is requested that the draft Plan is amended to either clarify the details of this proposed new car park, or remove it from the Proposals Map as no new car park is proposed.

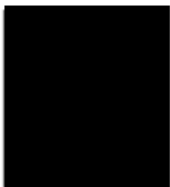
Conclusion

24. PAHT is seeking amendments to the draft Neighbourhood Plan to ensure that it provides a supportive planning policy context for PAHT's ambitions for the provision of enhanced healthcare facilities and services at St Margaret's Hospital, and elsewhere within its catchment area.
25. The proposed amendments would also help to ensure the draft Plan meets the 'basic conditions' for such plans set out at Section 8(2) of Schedule 4B to the Town and Country Planning Act 1990.
26. The requested amendments relate to the need for planning policies to take account of healthcare providers' proposals and strategies for meeting the healthcare needs of the existing and future residents of Epping.
27. We would be pleased to discuss the requested amendments with the Town Council and the District Council's Planning Policy team in advance of the draft Plan being submitted for Examination, if that would be helpful.

We would be grateful if you could confirm safe receipt of these representations, which we trust you will find useful and will take into account as part of the Publication Draft consultation.

Should you wish to clarify any of the matters raised, please do contact us.

Yours faithfully



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