



**Main Modifications
Local Plan**

Representations Form

Ref:

(For official use
only)

PART B - Your representation

Please complete a separate Part B for each representation and return along with a single completed Part A.

Question 1: To which Main Modification does your representation relate?

Representations must be made on a specific Main Modification (MM) or Policies Map change

MM Number 57 Policy CHW01 Paragraph _____

Figure/Table _____ Policies Map change _____

Question 2: Do you consider that the Main Modification is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|---|-----------------------------|
| a) Legally compliant | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| b) Sound | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Question 3: Please give details of why you consider the Main Modifications is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy CHW01

HUDUs initial response and that NHS property services, suggested changes to the wording of policy CHW01 in order to ensure that the NHS is able to effectively manage its estate, disposing of unneeded and unsuitable properties where necessary, to enable healthcare needs to be met and to accord with London Plan Policy S1(F2).

The following text has been added to the policy which is considered to be suitable to achieve this aim:

b) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services; or

In addition to the wording below:

The full or partial use of redundant community infrastructure for other forms of community infrastructure will be considered before alternative developments are considered, unless the loss is part of a wider public service transformation plan.

Continue on a separate sheet if necessary

Question 4: Please set out the modification(s) you consider is/are necessary to make the Main Modification legally compliant and sound with respect to the matters you have identified in Question 3 above.

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N/A

Continue on a separate sheet if necessary

Please note:

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Declaration of consent

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Signature  _____ Date 12/06/24 _____



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MM Number 33 Policy HOU01 Paragraph _____

Figure/Table _____ Policies Map change _____

Question 2: Do you consider that the Main Modification is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|---|-----------------------------|
| a) Legally compliant | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| b) Sound | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
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HUDU suggested that the supporting text states that public sector land represents an opportunity to deliver homes that can meet the needs of essential workers such as those working in health, fire, police, transport and support services. It is noted that the following line has been inserted which adequately addresses this concern:

Public sector development land also represents an opportunity to deliver homes that can meet the needs of essential local workers, such as those working in health, fire, police, transport and support services.

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Date 12/06/24 _____



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MM Number 86 Policy Site 4 Paragraph

Figure/Table Policies Map change

Question 2: Do you consider that the Main Modification is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|---|-----------------------------|
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| b) Sound | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
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Site Allocation 4 – Osidge Library & Health Centre

It was suggested by NHS property services that the indicative housing target of 16 units for this site and the reference to percentages in regards to the residential and commercial floorspace should be removed as no capacity testing has been undertaken. The Council has proposed to remove the reference to 50% floor space for both residential and commercial which is welcomed. However, it is noted that the indicative housing target remains and is reduced to 10 units to be consistent with the Council's most up to date calculations. Although, the NHS would prefer not to have an indicative amount proposed at this stage we acknowledge that the same approach has been taken for all site allocations and that, being indicative, does not bind the NHS to anything.

It is also noted that the site is listed as being in Council ownership. NHS Property Services pointed out that this is not accurate as NHSPS own the freehold for the Brunswick Park Health Centre.

Continue on a separate sheet if necessary

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NHSPS to be noted as the freehold.

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Signature *F. McElwain* Date 13/06/24



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MM Number 87 Policy Site 5 Paragraph

Figure/Table Policies Map change

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- | | | |
|--|---|-----------------------------|
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Stie Allocation 5 Edgware Hospital

As was suggested by Montagu Evans on behalf of NHS Property Services and supported by HUDU the prescriptive allocation of floorspace to be retained as hospital space (75%) has been removed which is welcomed.

Continue on a separate sheet if necessary

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MM Number 109 Policy Site 28 Paragraph

Figure/Table Policies Map change

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- | | | |
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Site Allocation 28 Edgware Underground and Bus Station

It is welcomed that community use is now added to the list of proposed uses as suggested by HUDU's comments.

Continue on a separate sheet if necessary

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