

NHS Property Services Ltd  
10 South Colonnade, Canary Wharf,  
E14 4PU

Email: [Rebecca.marwood@property.nhs.uk](mailto:Rebecca.marwood@property.nhs.uk)  
Twitter: @NHSPROPERTY  
[www.property.nhs.uk](http://www.property.nhs.uk)

**23/12/2022**

Dear Sir/Madam,

### **South Staffordshire Council – South Staffordshire Local Plan Review**

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, modernise or be protected in line with integrated NHS 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 policies set out within the South Staffordshire Local Plan Review are as follows.

**Policy flexibility (enabling the NHS to be able to promptly evolve its estate)**

**Introduction**

Policy **EC9** seeks to protect existing community facilities including health. This is further reiterated in policy **H14**. NHSPS do not support these policies for the reasons outlined below.

**Context**

In order to enable the NHS to be able to promptly adapt its estate to changing healthcare requirements, it is essential that all planning policies enable flexibility within the NHS estate. On this basis, NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed, which in turn delays vital re-investment in the NHS estate.

The NPPF is clear in stating that Local Plans should adopt policies that “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community” (Paragraph 93b).

It is important that policies consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services.

Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use.

With this in mind, we are keen to encourage that flexibility be granted to the NHS via the wording of any planning policy. This will ensure that the NHS can promptly and efficiently respond to the healthcare requirements of residents through the evolution of its estate.

**Amended Wording**

Local Plans should align their policies to “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;” (paragraph 93b). By considering that other appropriate forms of testing outside of marketing can be carried out to assess the suitability of premises there will be greater opportunity to facilitate/cooperate with NHS objectives to handle healthcare facilities strategically to provide the best services possible.

As such, the plan can be made sound through the inclusion of an additional supporting paragraph to Policy EC9 and H14.

The additional text should clarify that:

*Should a health site be declared surplus to requirements as part of a wider estate reorganisation programme to ensure the continued delivery of public services and related infrastructure, such as those being undertaken by the NHS then the loss or change of use of existing health facilities will be acceptable. Evidence of such a programme will be accepted as a clear demonstration that the facility under consideration is neither viable nor needed and that adequate facilities are or will be*

*made available to meet the ongoing needs of the local population. In such cases no marketing will be required.*

**Policy (developer contributions)**

Policy **H14** states that a financial contribution will be sought from development that will impact on health care facilities. NHSPS supports this part of the policy.

**Context**

The NHS, Council and other partners must work together to forecast the infrastructure and costs required to support the projected growth and development across the borough. A vital part of this is ensuring the NHS continues to receive a commensurate share of S106 and Community Infrastructure Levy (CIL) developer contributions to mitigate the impacts of growth and help deliver transformation plans.

Paragraph 34 of The NPPF is clear that ‘Plans should set out the contributions expected from development. This should include setting out... infrastructure (such as that needed for... health)’

The significant cumulative impacts of residential developments on healthcare requirements in the area should be recognised and, given their strategic importance, health facilities should be put on a level footing with affordable housing and public transport improvements when securing and allocating S106 and CIL funds, in order to enable the delivery of vital NHS projects. It is imperative that planning policies are positively prepared, in recognition of their statutory duty to help finance improved healthcare services and facilities through effective estate management.

We request that when setting planning obligation policies, the Council seek to address strategic as well as local priorities in planning obligations and engage the NHS in the process as early as possible.

NHSPS thanks you for the opportunity to comment on the South Staffordshire Local Plan Review and look forward to working with you to ensure that the needs of the health services are taken into consideration.

Yours faithfully,

Rebecca Marwood MRTPI

**Associate Town Planner  
NHS Property Services**