



## Property Services

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25 March 2024

BY EMAIL ONLY

### **RE: Local Plan Main Modifications Consultation 2024**

Thank you for the opportunity to comment on the above document. The following response is submitted by NHS Property Services (NHSPS).

#### **NHS Property Services**

NHS Property Services (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. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

#### **Consultation response**

We note that policies SD2, IN1 and IN2 are relevant to healthcare provision and that IN1 and IN2 are subject to proposed Main Modifications (MM10/MM11 for IN1 and MM12 for IN2). Whilst Strategic Policy SD2 is not included within the schedule of Main Modifications, we consider that there is an inconsistent policy approach between the current policy wording and the corresponding Policy IN1.

Although we recognise that Policy SD2 is intended to provide a high-level approach, as currently worded it should be made clearer that any potential loss of infrastructure provision would be considered in accordance with Policy IN1, which sets out the circumstances by which any loss would be deemed acceptable. At present this lack of consistency across the Plan means that it is not effective when considering against the tests of soundness.

We therefore propose the following modification to Strategic Policy SD2: Enabling Healthy Lifestyles and Wellbeing, bullet point 5 as follows:

- Be supported by, ~~and not result in a loss of~~, necessary infrastructure provision (Policies IN1 – IN2);

## **Justification**

It is worth noting that 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 supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation. We consider it necessary to make the suggested modification to ensure that the Plan can be effective in implementing the intended policy direction as set out in detail in emerging Policy IN1.

## **Conclusion**

NHSPS thanks Crawley Borough Council for the opportunity to comment on the Main Modifications Consultation 2024. Should you have any queries or require any further information, please don't hesitate to contact me.

Kind regards,

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**For and on behalf of NHS Property Service Ltd**

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