

Planning Policy and Conservation
Built Environment and Regulation
Surrey Heath Borough Council
Surrey Heath House
Knoll Road
Camberley
Surrey
GU15 3HD

NHS Property Services Ltd
10 South Colonnade
Canary Wharf
London E14 4PU
town.planning@property.nhs.uk
www.property.nhs.uk

07 July 2026

BY EMAIL ONLY

RE: Consultation on Surrey Heath Local Plan 2019-2038 Main Modifications

Thank you for the opportunity to comment on the above document. The following representations are 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.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. 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.

	Surrey Heath Borough Council Surrey Heath Local Plan (2019 – 2038) Main Modifications Consultation Response Form	Ref: (For official use only)
---	---	--

Please return:

By email: planning.consultation@surreyheath.gov.uk

OR

By post: Planning Policy and Conservation, Surrey Heath Borough Council, Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 9th July 2026 at 12:00 noon

NO LATE REPRESENTATIONS WILL BE ACCEPTED

This form has two parts:

Part A – Personal Details- need only be completed once.

Part B – Your representation(s). **Please fill in a separate sheet for each representation you wish to make.**

Surrey Heath Borough Council's Privacy Statement is [here](#)

Background

The Surrey Heath Local Plan 2019-38 was submitted to the Secretary of State for examination in December 2024. Subsequent Examination in Public hearing sessions were held between 16th September 2025 and 8th December 2025.

As a result of the examination thus far, the Planning Inspector appointed to examine the Local Plan has recommended a number of Main Modifications to make the plan sound and legally compliant.

These are shown on the Schedule of Main Modifications that has been published for consultation. These have been subject to a further Sustainability Appraisal and Habitats Regulation Assessment.

The Main Modifications are proposed without prejudice to the Inspectors' final conclusions which will take account of all representations submitted in response to this consultation.

The Council will send responses to the consultation directly to the Inspector by the Council for review.

Part A

You must provide your contact details. We are unable to accept anonymous comments. The names of respondents and submitted comments will be submitted to the inspectors and published on the Council's examination website. Personal information such as telephone numbers, addresses, and email addresses will not be published.

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Miss	
First Name	Zainab	
Last Name	Hussain	
Job Title (where relevant)	Graduate Town Planner	
Organisation (where relevant)	NHS Property Services Ltd	
Address Line 1	10 South Colonnade	
Line 2	Canary Wharf	
Line 3	London	
Post Code	E14 4PU	
Telephone Number		
E-mail Address		

Please note that your formal comments (known as representations) and your name will be made available on the Council's website. All other details in Part A of this form containing your personal details will not be shown.

The Council cannot accept confidential comments as all representations must be publicly available.

Part B – Representations

Please note:

- Representations should only relate to Proposed Main Modifications, Map Changes or the associated addenda of the Sustainability Appraisal and/or Habitats Regulations Assessment, and not to other aspects of the Plan.
- This is not an opportunity to repeat or raise matters that were or could have been part of earlier representations or hearings on the submitted Plan.
- In your representation you should succinctly provide all the evidence and supporting information necessary to support your representation and your suggested modification(s).
- You should not assume that you will have a further opportunity to make submissions.

Part B – Please use a separate sheet for each representation

Name or Organisation:	NHS Property Services Ltd
-----------------------	---------------------------

3. To which Main Modification does this representation relate?

Main Modification Reference Number:	MM40, MM69
-------------------------------------	------------

4. Do you consider the Main Modification is:

4.(1) Legally compliant
(delete as applicable)

Yes

4.(2) Sound
(delete as applicable)

Yes

5. Please give details of why you consider the Main Modification does not assist in achieving legal compliance or soundness or provide any other comments. Please be as precise as possible.

NHSPS welcome the Council's confirmation, in response to our representation at Regulation 19 stage, that a disposal decision taken by the relevant health commissioning body would constitute acceptable evidence to satisfy the policy. We consider that the robust existing internal process used to determine whether a facility is surplus to NHS requirements would be acceptable as evidence to satisfy the policy.

We also note the Council's removal of 'healthcare facilities' within supporting paragraph 5.46 (Ref. MM40) and within Appendix I: Glossary of the Local Plan (Ref. MM69). Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS as part of a published estates strategy or service transformation plan, we consider this would not be subject to criteria 2 (a) or (b) of Draft Policy INF4, given that the proposed modifications explicitly demonstrate that healthcare facilities would no longer fall under the definition of community facilities in the Local Plan.

NHSPS therefore supports the main modifications set out above, and considers draft Policy INF4 positively prepared and effective, and therefore sound.

6. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to

say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

7. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification?

N/A

Conclusion

NHSPS thank Surrey Heath Borough Council for the opportunity to comment on the Local Plan 2019-2038 Main Modifications. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

NHSPS would be grateful to be kept informed of the progression of the Local Plan and any future consultations via our dedicated email address, town.planning@property.nhs.uk.

Yours faithfully,

Zainab Hussain
Graduate Town Planner

E: [REDACTED]

For and on behalf of NHS Property Services Ltd
