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30th July 2026

BY EMAIL ONLY

RE: Consultation on the Ashfield Local Plan 2023 to 2040: Main Modifications consultation

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.

MM104 to Policy SD13: Provision and Protection of Health and Community Facilities

This response follows representations submitted at both Regulation 19 and Matters, Issues and Questions stages, in which NHSPS sought modifications to Policy SD13. Policy SD13 sets out the Council's approach to the provision and loss of health and community facility uses. In the Pre-Submission Draft of the Local Plan (November 2023), Policy SD13 restricts alternative uses for buildings or sites required for the provision of health and community facilities unless adequate provision is made, there is no longer a requirement for a facility in that location or the facility is no longer viable.

In Regulation 19 representations, NHSPS emphasised that policies aimed at preventing the loss or change of use of community facilities and services can potentially have a harmful impact on the NHS' ability to ensure the delivery of essential facilities and services for the community. NHSPS requested amendments to Policy SD13 to that where the NHS can demonstrate the loss of a health or community facility is part of a wider public service estate reorganisation, the principle of alternative uses for NHS land and property will be fully supported.

The Schedule of Main Modifications (June 2026) – Modification No. MM104 proposes to introduce 'or' between each of the criteria of Point 3 of Policy SD13, meaning that applications for the loss of health and community facilities would be required to satisfy only one of the criteria. Therefore, where it can be demonstrated that there is no longer a requirement for the facility in that location in line as part of wider NHS estate reorganisation and service transformation programmes, the loss of health and community facilities will be accepted.

However, it is noted that supporting paragraph 9.128 remains unaltered. For the sake of consistency throughout the entire local plan, and clarity in the interpretation of its policies, NHSPS recommend that the criteria listed in supporting paragraph 9.128 reflect the approach taken in the amendments proposed for Policy SD13 set out in MM104.

Recommended amendments to supporting paragraph 9.128 (*shown in red italics*):

The Council will resist the loss of health and community facilities unless there is no longer a requirement for the facility in that location. The application will need to demonstrate that:

- No shortfall in provision will be created by the loss; *or*
- Adequate alternative facilities are already available in the area; *or*
- A replacement facility that meets the needs of the local population will be provided the facility is no longer required in its current use.

Conclusion

NHSPS thank Ashfield District Council for the opportunity to comment on the Ashfield Local Plan 2030 to 2040: Main Modifications consultation. 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,

James Beackon
Graduate Town Planner

For and on behalf of NHS Property Services Ltd
