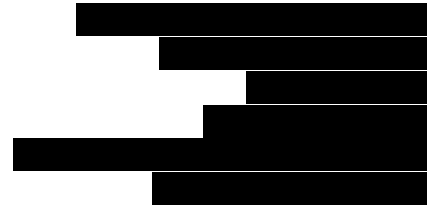


Telford and Wrekin Council
Strategic Planning Team
Southwater One
TF2 2FH
localplan@telford.gov.uk



16th July 2026

BY EMAIL ONLY

RE: Consultation on the Telford and Wrekin 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.

Telford and Wrekin Main Modifications to the Publication Version of the Local Plan
Public consultation 8th June to 5pm Monday 20th July

Word consultation response form

Please use this form if you wish to comment on the Telford and Wrekin Main Modifications to the Publication Version of the Local Plan. Further information can be found on the Councils website at www.telfordandwrekinlocalplan.co.uk

This form may be scanned or returned via e-mail to: LocalPlan@telford.gov.uk

Alternatively, forms can be posted to; Strategic Planning Team, Telford & Wrekin Council, Southwater One, TF2 2FH

How we will use your information

The information you have provided will be used to inform Main Modifications to the Publication Version of the Telford and Wrekin Local Plan. We will only publish anonymised responses, parts of responses, or a summarised version of responses and will ensure individual survey respondents cannot be identified. This information is being processed under DPA – Schedule 2 (2a) (GDPR 2018 -Article 6 (1)e).

We will not share your personal information with any other external third parties unless required/permitted to do so by law. Your personal information will be held securely, and if shared it will be shared securely. We comply with data protection laws concerning the protection of personal information, including the General Data Protection Regulation (GDPR). For more information on how information is held by Telford & Wrekin Council please view the privacy page at <https://www.telford.gov.uk/terms>

We are asking for your personal details to allow us to contact you where we require clarification/further information. You do not have to include your personal details but not doing so might affect the council's ability to act on the information you have provided.

Personal Details

Title	Click or tap here to enter text.
First Name	James
Last Name	Beackon
Address	
Commenting on behalf of (if relevant)	Click or tap here to enter text.
Organisation (if relevant)	NHS Property Services Ltd
Telephone	Click or tap here to enter text.
Email	

NOTE: The questions below are numbered 1 to 7. Please attach any typed or written responses related to the questions below when submitting this form.

The Planning Inspectors appointed to examine the Local Plan have recommended several 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 and have been subject to a further **Integrated Assessment Report Addendum**. These do not form part of the Main Modifications but are published alongside them and should be read in conjunction with the Main Modifications proposed.

All comments received will be sent to the independent Planning Inspector for consideration. Any comments received after the consultation close deadline will not be accepted.

The Council has also published proposed revisions to the Policies Map. These do not form part of the Main Modifications but are published alongside them and should be read in conjunction with the proposed Main Modifications.

Furthermore, the Council has prepared a schedule of 'Additional Modifications' to the Plan. These are minor changes to the Local Plan to deal with factual updates and clarifications, or address typographical, grammatical and presentational issues that do not affect soundness or legal compliance of the document. The Council considers that these do not materially affect the Plan. These 'Additional Modifications' are not subject to consideration by the Inspector and do not form part of the formal examination.

Representations should only relate to the proposed Main Modifications. This consultation is not an opportunity to repeat or raise further representations about the published plan or to seek further changes to the plan.

Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

MM100

Q2: Do you consider that this Main Modification is:

☒ Legally compliant

☒ Sound

☐ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Main Modification, please also use this box to set out your comments.

This response follows representations submitted at both Regulation 19 and Matters, Issues and Questions stages, in which NHSPS sought modifications to Policy CI2.

Policy CI2 sets out the Council's approach to the provision and loss of community infrastructure, including health facilities. As per the Regulation 19 Publication Plan (February 2025), Policy CI2 restricted the loss of community facilities unless acceptable provision remained on or off-site, or a lack of need was demonstrated through a 12-month marketing period. In successive representations, NHSPS outlines how policies aimed at preventing the loss of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community.

The Schedule of Main Modifications (June 2026) – Modification No. MM100 introduces wording under Part 4(c) of the policy in line with comments submitted by NHSPS. Part 4 of the policy now provides additional support toward demonstration of the loss or reduction of land or buildings identified as surplus as part of an agreed estates strategy or service transformation plan to justify the loss of an existing community facility. NHSPS support the inclusion of the wording proposed in Main Modification ref. MM100, however, would suggest for additional modifications be made to supporting paragraphs for clarity in the interpretation of the policy.

Supporting paragraph 12.10 reflects the requirements under Part 4 of the policy, which also captures the principle of the requirement under Criteria (c). As drafted, it is unclear whether supporting paragraph 12.10 would provide the same level of flexibility provided under Part 4, as proposed under Modification no. MM100. For the purposes of consistency throughout the plan, NHSPS request further modifications to supporting paragraph 12.10 to provide clarity and confirm the interpretation of the policy which would consider demonstration of Criteria (c) as sufficiently meeting the requirements of Part 4 of Policy CI2, without demonstration of further requirements (marketing period or alternative re-provision).



Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.



You will need to say why the change(s) will make the Main Modification legally compliant and/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.

Click or tap here to enter text.

Q5: Do you have any comments on the Integrated Assessment Report Addendum, in respect to this particular Main Modification? Please provide them in the box below:



Click or tap here to enter text.

Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:



Click or tap here to enter text.

Q7: Do you have any comments on one of the Councils Additional Modifications? Please provide them in the box below:

Click or tap here to enter text.

Conclusion

NHSPS thank Telford and Wrekin Council for the opportunity to comment on the Main Modifications to the Publication Version of the Local Plan. 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, [REDACTED]

Yours faithfully,

James Beackon
Graduate Town Planner

[REDACTED]

[REDACTED]