



Property Services

Development Strategy Team
Town Hall
Evreux Way
Rugby
CV21 2RR
localplan@rugby.gov.uk

NHS Property Services Ltd
10 South Colonnade
Canary Wharf
London E14 4PU
town.planning@property.nhs.uk
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13 March 2026

BY EMAIL ONLY

RE: Consultation on Rugby Local Plan – Proposed Submission Version (Regulation 19)

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.

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to health impact assessments, we would request the Council engage the NHS in the process as early as possible.

Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	Ref: (For official use only)
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Name of the Local Plan to which this representation relates: Rugby Borough Council Proposed Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026
By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in the subject line, OR by post to:** Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

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.

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	Miss	
First Name	Hyacynth	
Last Name	Cabiles	
Job Title (where relevant)	Town Planner	
Organisation (where relevant)	NHS Property Services	
Address Line 1	10 South Colonnade	
Line 2	Canary Wharf	
Line 3		
Line 4		
Post Code	E14 4PU	
Telephone Number	██████████	
E-mail Address	Hyacynth.cabiles@property.nhs.uk	

(where relevant)

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: NHS Property Services

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text" value="W1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text"/>
(3) complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Draft Policy W1 focuses on the protection and redevelopment of existing community facilities, which includes the requirement for proposals to demonstrate Part A criterion (i) and (ii) to justify the loss of an existing community facility. We note the Council's response to the comments submitted by NHSPS as part of the Regulation 18 consultation contained within the Local Plan Consultation Statement (2025). The Council, here, confirms health facilities are not included in the definition of community facilities that is pertained to in the requirements under Policy W1.

To ensure the effective implementation of the policy and for the avoidance of doubt in its interpretation, NHSPS would request this clarity is provided either through the addition of an exhaustive list of community facilities that is subject to the requirements of the policy (under supporting paragraph 7.1) and thus, excluding health facilities. Alternatively, we would recommend clarity to be provided through the addition of separate guidance within supporting paragraphs which specifically concerns health facilities.

Where it can therefore be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for

retention of a community facility use on the land or submission of onerous information.

To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification to supporting paragraphs of Draft Policy W1 to ensure the principle of alternative uses for NHS land and property will be fully supported.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification 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.

Proposed Modification to supporting paragraphs of Draft Policy W1:

"Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use."

Please note: In your representation you should provide succinctly 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.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

N/A

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:

<https://www.rugby.gov.uk/w/privacy#development-strategy>

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There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health. A way in which is through the use of a health impact assessment, which is a useful tool to ensure planning applicants and the Local Planning Authority have the right information to make sound planning decisions in promoting healthy and safe communities. The Planning Practice Guidance supports the use of health impact assessments.

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To support the health and wellbeing of communities and places, NHSPS recommend for the Council to set out its own HIA requirement to help implement its strategic objective on healthy communities, for example with a focus on major developments with potential for significant health impacts. Further guidance is provided by Public Health England (now the Office for Health Improvement and Disparities) in its 2020 guidance.

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Conclusion

NHSPS thank Rugby Borough Council for the opportunity to comment on the Rugby 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, town.planning@property.nhs.uk.

Yours faithfully,

Hyacynth Cabiles MRTPI
Town Planner
E: hyacynth.cabiles@property.nhs.uk

For and on behalf of NHS Property Services Ltd