

	<p style="text-align: center;">Surrey Heath Borough Council</p> <p style="text-align: center;">Pre-Submission Surrey Heath Local Plan (2019 – 2038) : (Regulation 19)</p> <p style="text-align: center;">Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to: planning.consultation@surreyheath.gov.uk
OR
Planning Policy and Conservation, Surrey Heath Borough Council,
Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 12.00 noon 20th September 2024 NO LATE REPRESENTATIONS WILL BE ACCEPTED

This form has two parts:
Part A – Personal Details
Part B – Your representation(s). (Please be aware that this together with your name will be made publicly available)
Please fill in a separate sheet for each representation you wish to make.

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

Please read the separate [guidance notes](#) before completing this form.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
<small>*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.</small>	
Title	
First Name	Sarah
Last Name	Isherwood
Job Title (where relevant)	
Organisation (where relevant)	Vail Williams LLP
Address Line 1	2 Noel Street
Line 2	
Line 3	London
Post Code	W1F 8GB
Telephone Number	[REDACTED]

E-mail Address

Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

	Yes	No
• The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?	X	
• The independent examiner's recommendations are published?	X	
• The Local Plan has been adopted?	X	

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 – Please use a separate sheet for each representation

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :	Frimley Health NHS Foundation Trust
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3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	ER6	Other, e.g. policies map, table, appendix	<input type="text"/>
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4.(1) Legally compliant (please refer to guidance notes)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (please refer to guidance notes)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness 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 Pre-Submission Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. You are advised to read our Representations Guidance note for more information on legal compliance and soundness.

The principles of ER6, Frimley Park Hospital are supported as Frimley Health Trust will continue to operate from the existing hospital site through the majority of the plan period until such time as a new hospital site has been identified, construction and commissioned. However we would seek minor modifications to Policy ER6 to align with the acknowledgement that the hospital will be relocated towards the end of the plan period. Please see separate representations letter for further justification.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and sound, having regard to the 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 Pre-Submission 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.

To ensure the plan is sound and fully justified, it is proposed that a modification is made to the justification text after section 4.89 or additional wording within Policy ER6 If parts, or all, of the existing Frimley Park Hospital site become surplus to requirement following the relocation of the hospital to an alternative site to meet the requirements under the New Hospitals Programme, the Council will positively consider proposals for alternative uses, which are considered to be complementary to any retained healthcare facilities on site. Any alternative uses should also comply with other relevant policies within this Local Plan document.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify 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 will be only at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate.

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

As identified in section 4.89 Frimley Park Hospital was named as one of five priority hospitals under the Government's New Hospitals programme with an ambition that it will be rebuilt by 2030 however there is no further information available at this stage to inform policies or allocations in the Local Plan. The Trust would like the opportunity to submit further evidence or take part in the Examination if there is a material change in this position to ensure the Inspector can consider the most up to date evidence on this matter.

Please note - the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Ref:
Date: 19 September 2024



Surrey Heath Borough Council
Planning Policy
Surrey Heath House
Knoll Road
Camberley
GU15 3HD

Vail Williams LLP
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W1F 8GB

Tel [REDACTED]
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Dear Sir/Madam

**Surrey Heath Borough Council: Regulation 19, Draft Surrey Heath Local Plan 2037
Representations on behalf of Frimley Health NHS Foundation Trust
Planning Policy Reference: Policy ER6**

Vail Williams LLP has been instructed by Frimley Health NHS Foundation Trust ('the Trust'), the longstanding owners of Frimley Park Hospital to submit representations to Surrey Heath Borough Council in response to the Regulation 19 draft Surrey Heath Local Plan (SHLP) 2038 consultation. These representations focus on policy ER6 which is the existing Frimley Park Hospital site at Portsmouth Road, Frimley.

Policy ER6

The Trust support the general principle of Policy ER6 which seeks to support the retention and improvement of healthcare facilities on the existing Frimley Park Hospital site.

As set out in the supporting text to Policy ER6, Frimley Park Hospital provides elective (planned) and non-elective (emergency) surgery to parts of population within Surrey, Berkshire and Hampshire. Frimley Park Hospital is one of the three main sites owned by the Trust alongside Wexham Park in Slough and Heatherwood Hospital in Ascot. Whilst there is recognition of the Trust's requirement to construct a new hospital under the New Hospitals Programme, which is set out in further detail later in this representation, the Trust continues to fully operate from the existing Frimley Park Hospital site.

s.4.92 of the justification text sets out that planning permission was granted for a new diagnostic and inpatient building. The Trust can confirm that this permission has been fully implemented and is currently being constructed with the new building due to be completed in Spring 2025. The Trust will continue to invest in the existing Frimley Park Hospital site along with any other required sites within the Borough or its surrounds to meet the needs of the Borough until such time as a new hospital has been completed. This will be alongside the ongoing investment the Trust continue to make in the extensive programme of precautionary monitoring,

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maintenance and repair of the RAAC planks to ensure the hospital operate whilst seeking to minimise disruption for patients and staff.

Consequently, the Trust agrees that Policy ER6 should support the principle of retained and new healthcare development at Frimley Park Hospital whilst the existing site remains operational as a hospital until at least 2030, under the current programme for the new Frimley Park Hospital.

However, it is recognised in s.4.89 that, *'In May 2023, Frimley Park Hospital was named as one of five priority hospitals under the Government's New Hospitals programme with an ambition that it will be rebuilt by 2030. The Council will work closely with the Foundation Trust regarding any relocation and/or reuse of the site. However, there is no further information available at this stage to inform policies or allocations in the Local Plan so any future proposals will be considered through a Local Plan Review, or other Policy mechanism as necessary.'*

As part of the process, the Trust alongside their clinical teams and advisors considered whether attempting to build a new hospital on the current site is a viable option. However, this would require a phased demolition and rebuild on a site which is already congested, causing significant disruption to patients, staff, and hospital services. Most importantly, however, it would be impossible to complete a phased build by the RAAC deadline of 2030. As a result, the Trust must seek to develop the new Frimley Park Hospital on an alternative site whilst the existing site remains fully operational to minimise the disruption on the existing hospital services for patients and staff.

The Trust's ambition for the new Frimley Park Hospital is to provide the highest quality urgent, planned, and specialist care in the most modern environment, as well as delivering first class care in the community. The Trust will also ensure that all these services are delivered from a hospital incorporating the very latest sustainability and environmental initiatives and cutting-edge digital technology.

As recognised in s.4.89 of the justifying text for Policy ER6 there is currently no further information the Trust can provide to the Local Plan process regarding a chosen site at this time as the Trust continues to progress through the site selection process to identify an alternative location for a replacement hospital. The Trust agrees that they will continue to work closely with SHBC regarding the planning process for any new Frimley Park Hospital. However, as the Trust has identified that due to the size and constraints of the existing site, the replacement hospital will need to be delivered on an alternative site, which will be within five miles of the existing site. The Trust has not yet established whether, once the new hospital has been developed and becomes operational, the existing site will be needed wholly, or in part, for required healthcare or healthcare-related uses or whether it may become surplus to requirement and therefore could create an opportunity for alternative uses to be developed. It is not anticipated this will be established under the site selection process has been completed and an alternative site identified.

For soundness, it is therefore requested that a modification is included around the justification wording for Policy ER6 after s.4.89 or within Policy ER6 itself to provide additional flexibility for alternative uses to be developed on the existing Frimley Park Hospital, towards the end of the plan period (post 2030). This would recognise the point that the hospital may be relocated to new site and therefore the existing Frimley Park Hospital site may wholly or partially become surplus to requirement. The Trust would only consider alternative/complementary uses on the existing Frimley Park Hospital site at a time an alternative site has been constructed and is operational to ensure continued healthcare provision is provided for the local population.

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If parts, or all, of the existing Frimley Park Hospital site become surplus to requirement following the relocation of the hospital to an alternative site to meet the requirements under the New Hospitals Programme, the Council will positively consider proposals for alternative uses which are considered to be complementary to any healthcare facilities which may be retained on site. Any alternative uses should also comply with other relevant policies within this Local Plan document.

Finally, it is requested there is a very minor modification to the numbering of the requirements set out in Policy ER6 are clarified, particularly with regard to the transport strategy requirement. As currently numbered the policy is not clear which elements are expected as part of the transport strategy (currently part (b)) and which are general policy requirements. It is suggested that an additional sub-section is added to part (b) to explicitly separate any requirements related to the suggested transport strategy.

We respectfully request to be kept informed of the Local Plan and examination process, including the opportunity to discuss this at examination with the Inspector if required.

If there are any questions regarding the site, please do not hesitate to contact us.

Yours faithfully

Sarah Isherwood MRTPI
Partner
For and on behalf of Vail Williams LLP
Mob: [REDACTED]
Email: [REDACTED]

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