

The Planning Unit
Royal Borough of Windsor and Maidenhead
Town Hall
St Ives Road
Maidenhead SL6 1RF

19th May 2017

Dear Sirs,

17/01188: Ben community health centre

We set out below our Parish Council's objections to the above Planning Application.

Firstly, we wish to express our concern that we weren't notified of this application, which is right on our boundary, and has a significant effect on our community.

We ask you to extend the consultation period to provide an opportunity for them to comment.

Objections:

- Contrary to the LP green belt policies. A medical centre doesn't fall within the permitted purposes of policy GB1 or GB3 and is therefore inappropriate development.
We don't interpret GB1 as allowing development of this form in the green belt under any circumstances.
 - a. *The site is an important gap between Sunninghill and Sunningdale, and its retention was strongly supported by the community in the NP consultations and at referendum.*
 - b. *The Lynwood development has had a huge negative impact upon the openness of the green belt on the adjacent site, and represents a major intensification in the use of this part of the green belt. The gap is therefore the only scrap of green belt left and must be retained.*
 - c. *The emerging LP proposes to remove significant areas of land from the green belt to allow the borough to deliver the assessed housing numbers. This makes retention protection of the remaining green belt all the more important.*
 - d. *1.39 of the Government Document "Fixing our Broken Housing Market states that when land is removed from the green belt local policies should require the impact to be offset by compulsory improvements to the environmental quality or accessibility of the remaining Green Belt.*

We understand that the Borough has adopted this document as policy. This site provides an ideal opportunity to enhance a site that has been severely damaged by the applicant and turn it into an ecological site or similar, which can act as a valuable receptor site.

We believe that the above arguments are effectively very special circumstances for not allowing any development on the site. If, however, the planners are minded to approve the development, subject to 'very special circumstances' we object on the following grounds.

- Contrary to NP/EN1.
Note that this policy applies to gaps that aren't in the Green Belt. Where in the GB, the GB policies apply.
- Contrary to Para 80 of the NPPF.
This states that one of the key purposes of the green belt is to prevent neighbouring towns merging into one another.
- The application doesn't answer the concerns of the Jacobs report [ref:B1593700/Ben Lynwood dated 14th Feb 2014] in relation to the site's role as a receptor site for reptiles displaced from the Lynwood site.
The report also recommended that vegetation removal should be undertaken under the supervision of an experienced ecologist.
The Jacobs report also states that weight can't be given to ecological studies that are over 3 years old. Both the Jacobs report and the report ref MWA, 2013 are beyond this period.
That dormice have now been found on part of the site supports this as they weren't found in the earlier studies.
The applicant has built a holding tank in the E corner of the site and has since extended his paved parking area significantly, and removed many trees in the process. This will have severely damaged the site's role as a receptor site and any reptiles that were in the area. The new works will extend the area of damage significantly.
- The area where dormice have now been found is in an area of the gap that has been subsumed into the care home site, with paths etc for the use of residents. Dormice are a protected species and this area should therefore be fenced and returned to its natural state.
- Contrary to the statement in 1.6 of the planning report the applicant hasn't attended the Sunninghill and Ascot Parish Council.
- The submission doesn't establish very special circumstances.
The evidence that the applicant has proactively sought other sites is weak.
Such discussions as the applicant has had are presented in Appendix 4 to the Grimes "Special Circumstances report, and were all in Q1 of 2015.

The report, which was prepared by Magnolia House, is dated 6.6.2015, and is therefore out of date. There is no evidence to show that the applicant has undertaken any site availability studies himself.

The liaison with the Government Property Unit re the possibility of relocating to that site were left to the then Chair of the Sunningdale PC in October 2014.

In January 2015 the Borough confirmed that they would be receptive to discussions re the redevelopment of Broomhall, subject to suitable commercial terms.

Savills didn't respond to a query from SPC re the plans for Cedar Drive, but did respond that they would be happy to discuss the possibility of a new surgery on the Broomhall site. They also say Savills have now (no date) confirmed the development is years away.

This is not correct. Savills wrote to Magnolia House on 2nd September 2015, to advise them that a new surgery could be accommodated within the Broomhall scheme.

- The proposal goes far beyond the relocation of the Magnolia House and Kings Corner surgeries, with an allowance to serve the increasing population.
The number of doctors increases from 9 to 20 and there will be 20 nurses and other health professionals (including those being trained); consulting type rooms increases from 15 to 35, there will be a 194 sq m pharmacy (c.f NHS 48 sq m suggestion); the gross area increases from [540 sq m to 2126 sq m], a 290 % increase; the number of staff increases to 45 full time and 40 part time; the range of primary care services to be provided is very much wider than those currently provided

It is therefore clear that the facility goes far beyond a local community centre for the catchment is Sunningdale and Sunninghill.

We understand that the centre is designed to serve a population of 50,000 people. This is far beyond the current list size of the 2 surgeries (16,461). It is therefore very clear that the facility is for a very much larger catchment. We consider it inappropriate to locate such a facility in an important green belt gap between communities.

- The pharmacy is 4 times the NHS suggested size.
It is in an inconvenient location for the community, and likely to undermine the sustainability of the village pharmacies, which are highly valued and provide a very efficient prescription service. Their loss would undermine the vitality of the high street.
- The Report on the special circumstances fails to provide any soundly evidenced case for the need for the proposed facility on this site (see below)
- The Kings Corner Surgery is relocated 0.7 km further away from Sunninghill and beyond the parish boundary. The footpath is dark, narrow, rough and hilly. The surgery is therefore outside a reasonable walking distance of all by a small portion of Sunninghill Residents.
- The proposal from the applicant is to provide the land and building in return for a rent no higher than the current rents paid by the surgeries.
This will, in due course, provide a significant revenue stream to the applicant from a green belt site that otherwise has no commercial value Appendix 4 of the Grimes Report). This has influenced his wish to deliver a significant facility on this site. It is surprising that the application is not being made by the appropriate health authority. We would at least expect a document of NHS support for this development. This suggests that the proposal may be largely speculative.
- The size of the development and its location will have a serious impact on the openness of the green belt. In the winter months the facility will be lit and this too will adversely affect the character of the green belt.
A significant portion of the gap is now within the Lynwood site and includes paths etc. This adds to the impact on the openness of the GB gap.
- The gap has been used for construction worker parking for a number of years. The parking area has recently been extended significantly and paved, and more trees removed. This together with the construction of the holding tank has resulted in the stripping of topsoil from a significant area, and the removal of scrub and a number of trees. This has had a significant visual and ecological impact. We would strongly object to the site continuing to be used for the construction of this facility.

- The landscaping is an integral part of the development, and is material to the decision process. Full details should therefore be included in the plans.
- There is no traffic impact assessment, and without it the application cannot be fully assessed.

Comment on the Grimes Report which sets out the special circumstances to permit development on green belt land.

This report fails to demonstrate very special circumstances:

- It doesn't demonstrate that alternative sites have been looked at in any proactive way, or more recently than Q1 2015.
As the facility serves a wide catchment area the search should be over a wider area.
- It doesn't demonstrate any benefit to the community from the provision of a pharmacy. We assess that its provision will impact negatively on the community and the vitality of our local villages.
- The report states that the primary healthcare provision for the two parishes will be split equally between Heatherwood and this facility.
This isn't correct. We understand that Heatherwood will be providing between 700 and 100 sq m for primary care.
- The proposal is to include significant GP and Nurse training facilities. There is no evidence to show they must be located here and not at Heatherwood or elsewhere.
- The growth figures don't take account of the housing numbers now available in the proformas in the emerging LP. These figures show that growth will be much lower than assumed and are constrained by the green belt.
- There is no evidence to demonstrate why such a major increase in the size is required over and above either the current size of the two surgeries [540 sq m], or above the 1095 sq m NHS recommendation for a surgery with the current number of patients. The identified growth in housing doesn't justify 2026 sq m, even with a contingency for some changes in primary care services.
The schedule in table 3 shows large increases in health professionals and other staff well beyond the current numbers, without any serious supporting evidence as to the need.
- Table 7, which is used to justify the size, is not based on the NHS requirements for the surgeries (HB11-01), but on the additional space required for a facility with 35 consulting type rooms. The basis of the 35 rooms isn't given other than broad statements about changing healthcare and the need to include a contingency to allow for this.
We are concerned that the facility will not prove sustainable and large parts will either be under utilised or vacant.
We believe that if the borough was minded to approve a health facility on the site this should only serve realistic requirements and be designed for future expansion if the demand so requires.
- There cannot be any justification for accommodating the requirements of the DERA development. The facility is too far away to serve that community other than as an interim measure.

Yours Faithfully,

Sunninghill & Ascot Parish Council