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Sian Saadeh Planning Officer RBWM

13 October 2021

Dear Sian

20/00969/FULL - Land to The North Lynwood Crescent Sunningdale Ascot The development of a community health hub (Use Class D1) with associated parking, access and landscaping.

The May 2020 plans submitted under 20/00969 have now been amended to take into account increased telephone consultation caused by the COVID-19 pandemic, feedback from public and specialist health consultation as well as improved compliance with planning regulations.

1. Revised 20/00969 Proposal

The Ascot Primary Care Network (PCN) comprises four surgeries that are to be subdivided into two new Integrated Care Hubs (ICH). The first, located at Heatherwood Hospital (Brook House GP practice) which opened on 22 June 2021 is for patients from Ascot Medical Centre and Green Meadows Surgery. The second ICH is proposed for Sunningdale adjacent to the Lynwood Village on Rise Road for Magnolia House and Kings Corner Surgery patients. Additional Community Services are also envisaged for both new practices.

However, a significant difference between the May 2020 and September 2021 (20/00969) planning applications is that the Statement of Clinical Need for the Sunningdale Health Hub (written August 2021) outlines the possible closure of Skimped Hill Health Centre in Bracknell. This closure would then result in the Community Services from Skimped Hill for ALL Ascot Primary Care Network patients (Ascot Medical Centre, Green Meadows Surgery, Magnolia House, Kings Corner) becoming the responsibility of the Sunningdale Hub. Similarly, Community Maternity Services, currently delivered from Frimley Park Hospital would also be the responsibility of the Sunningdale Hub for All Ascot PCN patients. It is understood that the above has been incorporated into the September 2021 planning application.

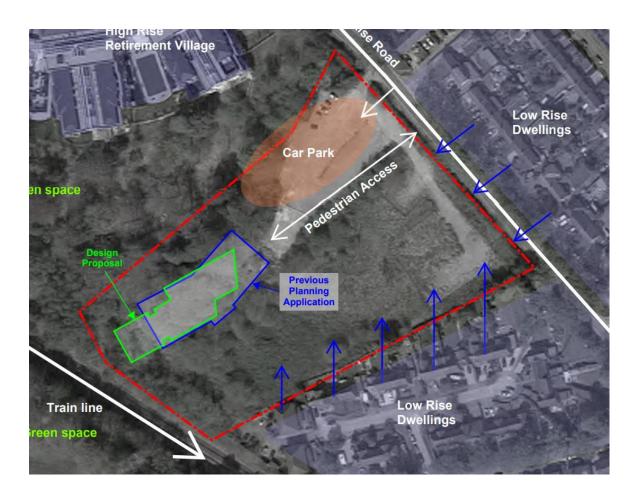
2. Sunningdale Hub location and design

All previous applications (13/03511,17/01188 and 20/00969) have essentially moved the same angled building into different positions on to the site, primarily to minimise the impact on the Green Belt. Changing from a single to a double storey building, introduced in 20/00969, also minimised the building footprint. The revised 20/00969 plan has moved on from the standardised angular design and has been adapted to align more satisfactorily with the site. As can be seen below, the proposed building closely follows the northern boundary with Ben Lynwood nursing home and is also positioned further into the site towards the railway line than any previous application.

It is the best position on the site that has been presented to date. The impact on the Green Belt is less than any of the previous applications and a distinct gap between villages (although smaller than existing) has been maintained. The probability of building creep between Ben Lynwood and the Health Hub, which was a concern with other site locations, has also been minimised.

Many community comments supporting previous Sunningdale Hub planning applications might have expressed concern how the necessity for a new medical centre was outweighed by failure to comply with Green Belt policy. Nevertheless, major reasons why 13/03511 was refused and 17/01188 was withdrawn included:

- a) inappropriate Green Belt Development
- b) failure to preserve the open nature of the site
- c) loss of the gap between villages.



20/00969 (September 2021)

The suggested building design from the architects, Murphy Philipps closely mirrors their other healthcare schemes with a reliance on sharp angles and rectangular forms. The Parish Council is supportive of the overall design approach and believe this represents the most acceptable design presented to date.



Sunningdale Health Hub, South elevation (top diagram) and North elevation

3. Health Hub size

The Parish Council had previously commented that the May 2020 application (20/00969) with a gross internal floor area (GIA) of 1867 sq metres was 28% bigger than the GIA of Waitrose (1451 sq metres). In the September 2021 application (20/00969) the GIA is now 1866 sq metres, **virtually identical** to the previous scheme. The building footprint has marginally reduced (May 2020: 1373 sq metres; September 2021:1224 sq metres) and the car park spaces have now slightly increased by 4 to 100.

In summary the building is almost identical in size to the May 2020 application. So, how might this extensive space be used?

The Clinical Health Hub report (August 2021) used to support the design and size of the building states that:

- a) The combined Magnolia House and Kings Corner Surgeries current practice list size of 16,580 on 1 July 2021 has been used as the baseline.
- b) A combination of growth due to demographics and housing developments gives an estimated patient list size of approximately 17,515 by 2041 for Magnolia House and Kings Corner Surgeries.

This includes allowing for planned Ascot and Sunningdale housing developments as shown below. Hence, the rationale is that the patient practice size of the combined surgeries will increase by 1,000 patients over the next 20 years.

Figure 5. Planned Ascot housing developments

RBWM ref	Address	Number of Units	Number of residents
AL16	Ascot Centre	300	720
AL17	Shorts recycling centre, Ascot	131	314
AL18	Ascot station car park	50	120
AL20	Heatherwood Hospital	250	600
AL32	Sandridge House, London Road	20	48
AL33	Broomhall Car Park, Sunningdale	30	72
AL34	White House, London Road, Ascot	10	24
AL35	Sunningdale Park, Sunningdale	230	552
	TOTAL	1021	2450

In reviewing how future services will be delivered at the Health Hub the same report states that this comprises a multi-skilled workforce including GPs, rotational paramedics, nurses, pharmacists, physiotherapists, mental health workers, occupational therapists, social care, citizen's advice, voluntary workers & patient navigators etc.

There were very few references the Parish Council was able to identify concerning the actual numbers of professional personnel envisaged for the Health Hub. The report states that 'an additional 27 full time equivalent (FTE) professionals would be working in primary care across the two new facilities at Heatherwood and Sunningdale by 2024.'

Hence, the planned increase of 27 FTE professionals is allocated over both the Heatherwood AND the Sunningdale sites by 2024.

In the absence of any published data to provide an approximate allocation by site, it could be calculated that as 53% of the total Ascot PCN current patients are at Magnolia House & Kings Corner on a pro rata basis an additional 14 professionals might be planned by 2024 at the new Sunningdale Health Centre. Or all 27 FTE professionals could be allocated to Sunningdale.

A national UK shortage of GP's has been well documented. The September 2021 planning application (20/00969) makes little or no reference to the number of GPs planned for the Sunningdale Hub.

However, using the current combined Magnolia House and Kings Corner patient numbers of 16,580 (July 2021) and the NHS published data which states there are 12 GPs at Magnolia Hose and Kings Corner in September 2021, this gives a ratio of 1,382 patients for each GP.

The same ratio of patients to each GP in 2041 (using the predicted 1,000 or so increase in patient numbers to 17,515 patients) can be achieved by increasing the number of GP's by just one to a total of 13 GP's.

Obviously the community would appreciate many more GP's being on the site, easier access to GP's and less reliance on GP telephone consultation. <u>In support</u> of the construction of a new Health Hub that is 28% larger than the internal floor space of Waitrose at Sunningdale, <u>the Parish Council would request further clarification about the actual numbers of planned professional personnel that are envisaged for the site.</u>

4. Number of rooms

The Vail Williams, Planning Statement, Revised Proposals, August 2021 states in section 6.3 that the key revisions to the proposals are a reduction in the number of consultation rooms from 32 (May 2020 application) to 24 at ground floor level (September 2021 revised plans).

Number of rooms				
Room description	20/00969 (May 2020)	20/00969 (September 2021)		
Exam/consultation/clinical	20	19		
Talk therapy	2			
Physio	2			
Practice manager	1			
Business/ Finance manager	1			
Nurse	2			
Midwife / anti natal	1			
Minor procedures	1	1		
Recovery	1	1		
Treatment/ consultation	2			
Bariatric treatment	1			
Practice Pharmacist	1			
Group room	1	1		
Clinical Outreach team	1			
Seminar room	1	1		
Training room	1	1		
Telephone room	1			
Administration room	1	5		
Staff room	1	1		
Digital consulting	0	9		
Office	0	2		
Interview	1	2		
Gym	0	1		
TOTAL	43	44		

Whilst the same report mentions the introduction of 9 digital consultation rooms at the 1st floor level, the impression is that the number of rooms overall has been reduced.

However, as can be seen from the table on the left, whilst the descriptions of the rooms might have changed between the two applications the number of rooms has remained virtually identical.

A number of rooms at the Health Hub have been categorised between Primary Care and Community Services as shown in the chart below. 24 rooms are allocated for Primary Care and 12 rooms for Community Services. It is assumed this includes provision for Skimped Hill and Frimley Park Hospital Community Maternity Services for Ascot PCN patients.

Type of Room	Number				
Primary Care					
Consultation/Treatment	13				
Interview	2				
Minor Procedures/Bariatric Treatment	1				
Recovery Room	1				
Digitally enabled rooms	7				
Community Services					
Consultation/Treatment	6				
Interview Rooms	2				
Physiotherapy Gym	1				
Group Room	1				
Digital Consultation	2				

5. Patient services to be offered at the Sunningdale Hub

The NHS website lists the following services that are currently offered at Skimped Hill: audiology, continence, sexual health, podiatry, MS, mobility and falls, dietetics and dental.

Figure 7, (Sunningdale Hub, Statement of Clinical need, August 2021) shown below lists the following services to be offered at the new Sunningdale Hub: musculoskeletal, talking therapies/ mental health, diabetes care (Type 1 and Type 2), dietetics, elderly patient assessment and rehabilitation, community specialist nursing (heart conditions, leg ulcers etc) podiatry, community midwifery

Figure 7. Community services planned for the Sunningdale development

Service	Description
First contact and MSK physiotherapy	Providing specialist musculoskeletal assessment and delivery of appropriate treatment packages.
MH Practitioner and IAPT	Providing access to talking therapies and other mental health clinicians for patients with mental health needs.
Diabetes Clinics	Supports adults with both Type 1 and Type 2 diabetes to help support self-management, increase their quality of life and reduce the risk of long-term complications.
Dietetics	Specialist, tailored dietary advice/treatment plans for adults and children for a number of eating/dietary-related clinical conditions. Can be delivered on a one to one basis or a group session.
Assessment and Rehabilitation Clinics	A service to support elderly and frail people. The service includes a range of professionals, including a geriatrician, to assess and develop a comprehensive care plans to support patients ir remaining independent for as long as possible. Classes for falls, frailty, Parkinsons and stroke patients can also be provided.
Community Specialist Nursing	Specialist nurse led clinics will be available to support patients with heart conditions, leg ulcer pathologies and continence concerns.
Podiatry	Providing specialist foot health assessments and treatments.
Community midwifery	Providing support to women during the ante and postnatal period.

As can be seen in the chart below, comparing the patient services listed on the NHS website that are currently offered at Skimped Hill with the services that are planned for the new Sunningdale Hub there is little in common. Podiatry is really the only service currently offered at Skimped Hill that is also planned for the Sunningdale Hub.

Hence, if the intention is for Community Services offered at Skimped Hill to move to Sunningdale (for all Ascot PCN patients) then the Parish Council would request clarification on which patient services would be transferred as this is likely to influence the building design as well as the configuration and size of the clinical rooms. For example, dental and audiology services (currently shown at Skimped Hill) would require input at the architectural design stage to safeguard against subsequent expensive and inconvenient retrospective room alteration.

Patient Services at Skimped Hill and the new Sunningdale Hub			
	Skimped Hill- services currently offered. NHS website	Sunningdale Hub- Services planned (Figure 7 statement)	
Audiology	Yes	No	
Continence	Yes	?	
Sexual Health	Yes	No	
Podiatry	Yes	Yes	
MS	Yes	?	
Mobility & Falls	Yes	?	
Dietetics	Yes	No	
Dental	Yes	No	
Musculoskeletal		Yes	
Talking therapies/ mental health		Yes	
Diabetes care		Yes	
Elderly patient assessment / rehabilitation		Yes	
Community specialist nursing		Yes	
Community midwifery		Yes	

6. Other changes between the May 2020 and September 2021 submissions for 20/00969

a) Opening hours

Whilst staying open later weekdays and opening on Saturday morning has not been excluded, the core opening hours are different to those proposed under both 17/01188 and the May 2020 version of 20/00969. Core weekday hours of 8am to 8pm have now been changed to 8am to 6pm. Similarly, on Saturday morning the Sunningdale Hub will be closed. The opening hours below are the ones used for planning calculations.

Scheduled GP Opening Hours- used for planning application calculations*			
	17/01188	20/00969 (May 2020)	20/00969 (September 2021)
Monday to Friday	8am to 8pm	8am to 8 pm	8am to 6.30pm
Saturday	8.30am to 12.30pm	8.30am to 12.30pm	Closed
Sunday	Closed	Closed	Closed

b) Contacts per patient per year

The planning assumption previously used for contacts per patient per year was 5.35 whereas the latest application revises this to 6.0 contacts per patient per year to reflect the increasing demand for appointments and an ageing population

c) GP appointment duration time

Each GP appointment duration has been increased from 12 to 18 minutes to take into account the time required for more complex patients requiring double appointments as well as the training and supervision of trainees

d) Clinical Room Utilisation Rate

The planning calculations now assume a new Clinical Room Utilisation Rate so a room would have a total of 1.5 hours downtime per day which would give an 85% room utilisation rate. It is understood that previous applications had assumed a 100% room utilisation rate. The Parish Council comment that assuming downtime for lunch and time between patients must be expected.

7. Theoretical patient population that can be treated at the Sunningdale Hub

A theoretical calculation to be made using all the variables stated in the planning application to calculate how many patients could be treated in the available clinical room. The Parish Council have included the following variables:

- a) Consulting rooms (Consulting rooms + digital consulting rooms). Assumed 28 rooms.
- b) Total hours open each year (Mon to Fri) 0800 to 1830; 10.5 hours a weekday X 50 weeks)
- c) Patient consultation time of 18 minutes.
- d) Clinical room utilisation rate of 85%
- e) Each patient visits their GP practice 6 times each year

The Parish Council accepts that this is a theoretical calculation, but it is one indicator that can be used to assess the size of the Sunningdale Hub.

Using the above criteria, exactly as submitted in the planning application, it is calculated that the size of the planned Health Hub could serve a patient population of 34,708 patients.

This would then be twice the predicted patient population for Kings Corner and Magnolia House of 17,515 patients by 2041 as used in the planning application. Hence, according to our calculations there can be little doubt that the space allocated is more than the demonstrated need.

8. Other personnel planned for the Health Centre

The Parish Council had questioned the number of administrative personnel that were planned for the Sunningdale Hub in our letter of May 25th 2020. That 20/00869 plan had illustrated 29 seats in a 130m2 administrative room. The concern was that the new Hub would be an administrative centre for all 4 surgeries in the Ascot PCN. The revised application has now omitted any seating plans making comparisons difficult.

However, referring to the table in Section 4 above there are now 5 Administrative rooms rather than 1 Administrative room and 2 new Office rooms have been introduced.

<u>Further clarification is therefore required about the number of administrative personnel that are planned for the new Hub.</u>

9. Car park

Room/ Workstation	Max. No Staff
Consulit/exam/treat	20
Interview	4
Minor Procedures	2
Physio gym	1
Digital consultation	9
Reception	7
Practice Management	4
Practice Administration	26
Total	73

a. Number of spaces

Understandably, calculations for the number of car parking spaces required includes provision for the expected number of practice personnel planned to be on the site.

As can be seen in the submitted chart on the left from the Transport Statement, this refers to a maximum of 26 Practice Administration personnel and 4 Practice Management personnel being on site.

Hence, there would appear to be an almost identical number of administrative personnel at the Hub as in the May 2020 application.

This revised application also uses the RBWM parking strategy of 3 parking spaces per consultation room as in the previous application and calculates that a total of 100 spaces are needed. The two charts below are the accompanying supportive evidence from the Transport Statement.

Table 4.1: Proposed Car Parking Provision (Consultation Rooms)

Land Use	No. rooms	RBWM's Parking Requirement	Proposed Provision
D1 Doctor's Surgery	25 consultation rooms	3 per consultation room	75

Table 4.2: Proposed Car Parking Provision (Other Facilities)

Facility		Occi	Proposed	
	No. rooms	Patients	Staff	Parking Provision
Digital consultation	9		1 clinician (per room)	9
Physio Gym	1	Up to 4 patients	Up to 2 staff	6
Group Room 1 Up to 20 people				10
Total (Other facilities)				25

The 100 car park spaces above would appear to be fully allocated using the RBWM car parking strategy. <u>The Parish Council therefore requires clarification where the car park spaces for the 30 administrative staff are included as there appears to be nowhere allocated for these people.</u>

10. Overflow car park

The Parish Council has made previously requests to RBWM Enforcement, that the Green Belt should not be used as an overflow car park for Ben Lynwood Nursing home. Letters dated (13 September 2019, 19 September 2019 via Peter Lerner - Planning Consultant (case 17/50074/ENF), 24 September 20219, 28 October 2019, 27 November 2019) have outlined the problem. Unfortunately, the current gravel area on this part of the Green Belt, which would be in exactly

the same place as the proposed new car park, continues to be used every day as an overflow car park for Ben Lynwood with approximately 25 to 30 cars parked there daily.

If this practice were to continue then about 30% of the new car park would likely be used by personnel not associated with the Sunningdale Hub and would lead to an overspill parking problem on to Rise Road. Hence, to prevent a real problem occurring in future the Parish Council requests this planning application include a more permanent method of controlling car park access possibly electronically but one that must still provide Free of Charge parking for eligible Sunningdale Hub personnel. It is worth noting that the freehold of Both Ben Lynwood Nursing Home and the proposed new Sunningdale Hub site are under the same ownership so the Nursing Home cannot relinquish ownership of this problem.

11. Traffic

With the introduction of the additional community services at the Health Hub there will inevitably be a substantial increase in traffic to and from this site.

Given that staff and patients who previously went to Skimped Hill and Frimley Park will now be travelling to Sunningdale, the number of additional journeys along Rise Road will be substantial. These will be predominantly made by car as there is very limited public transport that passes this site.

No updated traffic statistics have been provided to allow the full impact of this additional traffic to be assessed. It is not clear how this additional traffic can be accommodated in the car parking assumptions for this site.

Obviously, this was not such an issue when the Health Hub was only supporting the residents of Sunningdale and Sunninghill – and not the wider Ascot PCN community.

12. Trees

Trees scheduled for felling					
Tree number	Tree type	Tree category	Tree height (metres)	Comments	
Group 11	Oak, Sweet chestnut, Holly, Hornbeam	B2	11	Number of trees in group not specified	
12	Copper beech	B2	15		
13	Deodor cedar	B2	15		
14	Oak	B1	19		
Group 15	Holly	C2	8		
16	Beech	A2	23		
17	Beech	A2	23		
Group 18	English oak, goat willow	C2	10		
Group 28	English oak	C2	9	Close to road. Poor quality. Number of trees in group not specified	
Group 49	Scots pine	B2	18	Number in group unknown	

The chart to the left lists the trees to be felled. The loss of two Category A trees (T16 and T17) would appear to be the most significant. These are positioned to the Northwest of the site approximately at the point where the car park abuts the Eastern side of the Sunningdale Hub. If the RBWM Tree team was able to recommend any alterations to the car park at this point or any minor repositioning of the building to avoid the felling of these two 23-metre-high category A beech trees that would obviously be very advantageous for the project.

13. Lease duration

The 17/01188 application indicated that the leasehold would only extend to 15 years. The 20/00969, May 2020 application had stated that 'the CCG are working with Ben Lynwood on the details of the lease arrangements which is currently intended to be a 40-year lease of the building with a break after 25 years'.

The Parish Council was unable to locate any update on this important aspect of the application and request. Given the planned financial expenditure and the difficulty of locating alternative, acceptable sites any planning approval must surely only be granted when an acceptable lease term can be legally enforced. Clarity about the actual lease agreement is required.

14. Conclusion

The Parish Council welcomes the repositioning of the building and the car park closer to the railway line and on the Northwest boundary with Ben Lynwood nursing home. This represents probably the optimum position on the site. Similarly, the building design with its angular approach is the best proposal we have seen to date.

However, the NPPF/88 planning statements are very clear that substantial weight is given to any harm to the Green Belt. To over-ride the NPPF Green Belt policies, developers must demonstrate "very special circumstances". As stated earlier, failure to demonstrate Very Special Circumstances (VSC) resulted in the refusal of 13/03511 and the withdrawal of 17/01188. The Very Special Circumstances are:

- a) The proposals meet a clear need, no more and no less
- b) There are not alternative sites within the local area which could be utilised to fulfil the proposed development
- c) The proposed site has overriding advantages over other locations for the proposed application
- d) The harm to the green belt by reason of inappropriateness, and any other harm resulting from the proposal is clearly outweighed by other considerations

Following these guidelines, it is difficult for the Parish Council to fully support the use of the Sunningdale Hub on the Green Belt for an estimated 30 administrative personnel for surgeries that are situated elsewhere within Ascot PCN. Similarly, there must be concern over those patient community services from Skimped Hill and Frimley Park that will likely transfer to the Sunningdale Hub when so many details of this transfer still need clarification and especially as the new Hub will treat all Ascot PCN patients.

The applicant continues to try and justify a building that, from our assessment, appears to be substantially oversized for the needs of the local residents. As such this fails to meet one of fundamental 'very special circumstances' as stated above: "meet a clear need, no more and no less".

Justification for alternative sites continues to find positive support for Ben Lynwood and only negative comments for any other site, such is the commitment to this Green Field site.

Reviewing the internal floor area size, the number of rooms and the car park spaces now proposed it is evident that this is more or less the same size as the May 2020 submission with some carefully planned reassignment of room names and sizes.

There can be little doubt that any local health centre that is 28% larger than Sunningdale Waitrose is a large building and according to our calculations, will have the capacity for seeing approximately twice as many patients as predicted by the NHS for 2041.

It would be excellent if the proposed building size and services being offered were matched by a commensurate increase in professional health care personnel, but the Parish Council was unable to find any such supportive evidence in this application.

If such information can be provided to help answer our questions, then the Parish Council would have no hesitation in supporting the Sunningdale Health Hub.

Yours sincerely

Yvonne Jacklin and Michael Burn Co-Chairs of the Planning Committee