

**SAXON HOUSE, HILLSIDE  
ROAD, BURY ST EDMUNDS,  
IP32 7EA**

WORKING PAPER 4

**ADDITIONAL INFORMATION**

September 2018  
On behalf of Northmores

**Carter Jonas**

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## 1.0 SITE SEARCH

### Background

- 1.X Community Dental Services and Suffolk Community Healthcare leased premises in Bury St Edmunds town centre (Blomfield House, Looms Lane) until 31 October 2017 when their leases were terminated.
- 3.6 Since becoming aware of the need to move out of Blomfield House (Spring 2017 – at relatively late notice) CDS and SCH have been looking for relocation opportunities (see chain of e-mails between CDS and Norfolk and Suffolk NHS Foundation Trust at Appendix 1). A number of temporary locations and arrangements were found. However, the search for a site to relocate to permanently took rather longer.
- 1.X CDS identified Saxon House as a suitable site for its permanent relocation in Summer/Autumn 2017. However, Saxon House did not have the necessary planning consent, despite CDS initially believing it did. CDS therefore applied for planning permission for dental clinic (D1) use in September 2017. Planning permission was granted in January 2018. **In granting consent the Council implicitly accepted that there were no other suitable or available sites closer to the town centre.** Indeed, the delegated officer report for the application confirms that: *“No other NHS or Council property’s Suitable for the D1 use are available in the area” and “Having regard to the specialist nature of the service which would be provided, the proposal is considered acceptable”.*
- 3.5 The appropriateness of Saxon House for CDS’s operation has already been confirmed therefore. However, Saxon House is too large for CDS alone meaning that it would not be viable for them to occupy it exclusively.
- 3.7 It was for this reason that SCH, screened Saxon House out during their site search – it was too big for them to occupy on their own and they were unaware of CDS’s plans to take a lease of the building (which had to be kept confidential until the lease was signed). In due course, SCH became aware of CDS’s plans and, once they were aware that CDS’s proposed use of the building would leave it underutilised, they started to consider Saxon House as a permanent relocation possibility.

### Site search

- 3.9 CDS and SCH undertook separate site searches. However, both searches yielded the same result. This corroboration points to the repeatability and therefore reliability of the respective searches.
- 3.X As quasi NHS bodies/NHS service providers CDS and SCH were encouraged to explore and exhaust any relocation opportunities which existed within the NHS estate prior to considering other sites. CDS and SCH’s site searches reflected this.
- 3.8 The sequence of search therefore looked as follows:
  1. Review of available NHS owned property;
  2. Review of available NHS associated/partner property (e.g. GP surgeries); and
  3. Review of premises on the open market.
- 3.9 The site/premises requirements for both searches were as follows:
  - located in or close to Bury St Edmunds (as the major centre within the West Suffolk area);
  - available now (given the limited notice the parties were given about the termination of their leases and, as time went on, the time they had already spent searching and the unsustainability of the temporary arrangements they were adopting once their leases had terminated);

- modern (to future proof the services to be provided and to afford an appropriate environment for the delivery of services to vulnerable patients);
- accessible location (a large proportion of patients of both services travel by car); and
- sufficient floor space to accommodate the necessary aspects of each organisation's work.

3.X **It should be noted that neither CDS or SCH were in receipt of planning advice at the time of their search. Indeed, it is not reasonable to expect them to have been. As has been alluded to above and explained below, both bodies were under a considerable degree of pressure to find new premises when they were advised at short notice of the closure of Blomfield House. Without any knowledge of the planning system both parties set about trying to find the most suitable premises they could in the limited time available. They did not know, and it would be unreasonable to expect them to have known of the sequential approach to site selection that they might have been expected to adopt. Regardless, a sequential approach was adopted in any case, as this was the most logical way to approach the search. However, understandably in the circumstances, records of the search were not kept. In any case, it should be noted that there is no requirement in planning policy for proposals of this nature to adopt the sequential approach to site selection. Therefore, while it is helpful for the applicant to demonstrate a logical approach to site selection they cannot be expected to satisfy formally the sequential test.**

3.X The following subsections consider the various aspects of the site search.

### NHS England and NHS Property Services

- May/June 2017: CDS had various communications with NHS Property Services Ltd and Norfolk and Suffolk NHS Foundation Trust – none of which identified any suitable properties – the e-mail chains at Appendices 1 and 2 both confirm a lack of suitable NHS estate premises within the Bury St Edmunds area:
  - *“There’s not a great deal of suitable premises available in the Bury area at the moment”*
  - *“We have had some initial discussions with Jon Haworth and Jacqui Grimwood regarding the relocation of staff but NSFT have not be able to offer alternative accommodation to anyone unfortunately”*
- Further discussions between CDS and NHS estates bodies yielded the following possible premises:
  - The existing community healthcare facility at Stow Lodge, Stowmarket
  - Possible use of a surgery in West Suffolk Hospital
  - Possible use of a surgery at a dental practice in Bury St Edmunds on certain days
  - None of the above had anything like the capacity required for CDS to deliver their full service offer.
- Similar communications occurred between SCH and the NHS estates bodies with the same result

### Web search

- CDS and SCH both conducted web searches for suitable premises regularly during their site searches
- In the case of CDS the only possible lead was an existing dental practice in St Andrews Street but it was too small and the available space was on the first floor with no suitable lift
- SCH were unable to find anything suitable
- SCH did however find Saxon House but subsequently discounted it on the basis that it was too large and therefore too expensive for them to occupy on their own

### Agents

- CDS and SCH both contacted local commercial property agents, including Hazells and Barker Storey Matthews, with a view to identifying suitable premises
- The only result this yielded was Saxon House
- CDS's lease of Saxon House was eventually secured through Hazells

## General

- The supporting letter from the Head of Estates for NHS England Midlands and East which was submitted with the application confirms that: *“A great deal of effort was put into trying to find alternative premises closer to the centre of the City, but this has not proved possible”*
- Given the number of healthcare related uses on Suffolk Business Park and in close proximity to Saxon House it seems very likely that it is not only CDS and SCH who have struggled to find suitable premises for healthcare uses closer to the town centre

## Conclusion

- 1.X While the available evidence of the site searches undertaken by CDS and SCH is limited it is clear that appropriate searches did occur and that a great deal of effort was made to find the most suitable premises for each of the organisations to relocate to.
- 1.X The suitability of Saxon House as a premises for CDS has already been accepted by the Council in its approval of planning application DC/17/2406/FUL. However, as has been explained in the current planning application for the site this leaves the upper floor of the building vacant. Given the benefits associated with co-location of similar uses, particularly those as closely aligned as the delivery of specialist healthcare to vulnerable patients (especially where the uses have been co-located previously); the excellent access arrangements available at Saxon House; and the suitability of the premises in terms of facilities, quality and specification; Saxon House automatically ranks highly in terms of suitability when establishing the optimal site for the relocation of SCH.
- 1.X Due to the position that both organisations were put in owing to the very limited notice they were given of the closure of Saxon House, and the fact that, quite understandably, they had no knowledge of the planning system with respect to sequential site searches, records of the site searches were not kept. The site searches evolved quickly and both parties were in a race against time to find suitable premises. The searches were therefore necessarily forward looking and producing an audit trail was not necessary, nor was it a prudent use of resources at the time.
- 1.X Notwithstanding the foregoing, sufficient information has been collated and presented to demonstrate that the a logical process was followed and that no sites which were either as suitable as Saxon House or more suitable than Saxon House were available.
- 1.X While there is no planning policy requirement for a sequential approach to site selection for the facilities proposed the applicant has demonstrated that the site searches conducted adopted the principles of a sequential search and therefore that, at the time of the completion of the search, Saxon House was the most suitable of the premises available. Indeed, it was the only suitable premises available at the time and, to the best of the applicant’s knowledge, remains so.

## 2.0 RELATIONSHIP WITH NHS STRATEGY FOR WEST SUFFOLK

2.1 Queries have been raised regarding the possibility of a temporary consent in this case, partly owing to proposals for a combined healthcare facility within a broader public sector services facility in Bury St Edmunds (some have suggested this will mean Saxon House is no longer required for the delivery of the subject services). Further information on the implications of these proposals for the application scheme has therefore been requested. The following should be noted:

- The application seeks a permanent planning permission and the Council is respectfully directed to determine the proposal before it (a temporary consent has not been mooted or requested by the applicant at any point)
- The chain of e-mails between CDS and NHS Property Services Ltd at Appendix 2 confirms that: *“In terms of Bury St Edmunds there is an aspiration for a joined up public sector facility, incorporating Health, but this is at quite an early stage so your plans to relocate elsewhere shouldn’t impact”*
- As far as the applicant is aware there is no timescale in place, or indeed close-to-final plans in place, for the joined up public sector facility referred to
- There is no indication of what the joined up public sector facility can or will be able to provide
- There is no guarantee that the planning permission for the joined up public sector facility will be secured
- There is no guarantee that the current NHS strategy of joined up services will endure
- There is every possibility that greater privatisation on NHS services will occur and that bodies such as CDS and SCH may not have a place in a joined up public sector facility

2.2 It is therefore the case that it would be wholly unreasonable for the Council to grant a temporary or time-limited consent in this case. Indeed, the Council would be operating beyond the powers conferred upon it by doing so. The application does not seek a temporary consent and there is no justification for granting such a consent in this case.

**APPENDIX 1: CHAIN OF E-MAILS BETWEEN CDS AND NORFOLK AND SUFFOLK NHS FOUNDATION TRUST**

**APPENDIX 2: CHAIN OF E-MAILS BETWEEN CDS AND NHS PROPERTY SERVICES LTD**



## Sykes-Popham, Richard

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**From:** Amy Schiller <Amy.Schiller@cds-cic.nhs.uk>  
**Sent:** 12 September 2018 10:31  
**To:** stclair@eggarton.com  
**Subject:** FW: CDS-CIC - Blomfield House

*With Kind Regards,*


*Amy*

Amy Schiller, Operations Director (Suffolk and Thetford)



Community Dental Services  
7, Hillside Road  
Bury St. Edmunds IP32 7EA

E-Mail [amy.schiller@cds-cic.co.uk](mailto:amy.schiller@cds-cic.co.uk)  
Tel: DD 01284 630130 Mob 07825 656124  
[www.communitydentalservices.co.uk](http://www.communitydentalservices.co.uk)

 Follow CDS on Facebook

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**From:** Graham Hotchen  
**Sent:** 23 June 2017 10:33  
**To:** Poulson Claire (NSFT)  
**Cc:** Kittle Mark (NSFT); Amy Schiller  
**Subject:** RE: CDS-CIC - Blomfield House

Hi Claire,

Many thanks for your note. The speed with which this notice is being effected has taken us a little by surprise - we were certainly not aware at of any intention of your closing the building. As such it does present significant operational issues for us and potential loss of service to patients. We are actively looking for alternative solutions and have kept Healthwatch informed of the situation. It is not possible to safely put in place any of a number of contingency plans we are pursuing and to demobilise the equipment by the end of Sept 17<sup>h</sup>. I believe we will need to occupy for an extended period of at least 2 and possibly 3 months. Could you take this note as a formal request for such an extension and what the process is from this point.

Best wishes,

Graham

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**From:** Poulson Claire (NSFT) [mailto:Claire.Poulson@nsft.nhs.uk]  
**Sent:** 06 June 2017 17:04  
**To:** Graham Hotchen  
**Cc:** Kittle Mark (NSFT)  
**Subject:** RE: CDS-CIC - Blomfield House

Hi Graham

My apologies for the delay in coming back to you.

Due to significant investment required in Blomfield House the NSFT board has decided that the property should be disposed of by the end of this year.

We have had some initial discussions with Jon Haworth and Jacqui Grimwood regarding the relocation of staff but NSFT have not be able to offer alternative accommodation to anyone unfortunately. In terms of extending your occupation until suitable alternative accommodation is found, we may be able to extend this by 1 maybe 2 months but we would prefer not to be in that position as we are concerned if the heating system fails as its on its last legs and also the roof is leaking.

Have you been in contact with NHS Property Services in relation to alternative accommodation?

*Claire Poulson*  
*Property Manager*

*Norfolk and Suffolk NHS Foundation Trust*  
*Estates Department*  
*The Hollies*  
*St Clements Site*  
*Foxhall Road*  
*Ipswich*  
*IP3 8LS*

*Tel: 01473 320913*  
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**From:** Graham Hotchen [mailto:Graham.Hotchen@cds-cic.nhs.uk]  
**Sent:** 11 May 2017 15:53  
**To:** Kittle Mark (NSFT); Poulson Claire (NSFT)  
**Subject:** CDS-CIC - Blomfield House

Dear Mark / Claire,

I am contacting in reference to the proposed closure of Blomfield House in late September 17, on the advice of Ian Burns, Property Strategy Manager Eastern England.

I am not clear what the plans are at the moment (if any) to find alternative premises or who is taking a lead on identifying any alternatives. In fact, the last note that I saw said that potentially individual occupiers would need to make their own individual arrangements. Before I embark on that option I would just like to confirm with you whether there are, to your knowledge, any plans to provide alternative premises currently being worked on, or any other NSFT premises available that CDS-CIC could occupy from September? CDS-CIC currently occupies the complete first floor of Blomfield House and I understand a compressor room in the basement.

Secondly, I would seek your advice on the process to be followed if we would need to occupy the premises for an additional number of months if alternatives cannot be found.

I would welcome the opportunity to discuss the above with you at your convenience or can travel to you offices. Could I schedule a call or visit, please?

Very best wishes,

**Graham Hotchen**  
**Business Transformation Director**  
**07816 669201**

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## Sykes-Popham, Richard

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**From:** Graham Hotchen <Graham.Hotchen@cds-cic.nhs.uk>  
**Sent:** 12 September 2018 11:05  
**To:** Eggarton; Amy.Schiller  
**Subject:** FW: Strategic opportunity!

Hi both – This is a useful note. I followed this up with a telephone conversation with Ian ( note his job title!). He said that nothing came to mind other than potentially moving to a space in Bury hospital. That was not feasible

Graham

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**From:** Burns Ian (NHS Property Services) [mailto:Ian.Burns@property.nhs.uk]  
**Sent:** 11 May 2017 10:49  
**To:** Graham Hotchen  
**Subject:** RE: Strategic opportunity!

Hi Graham

Happy to have a chat on the phone anytime. In terms of Bury St Edmunds there is an aspiration for a joined up public sector facility, incorporating Health, but this is at quite an early stage so your plans to relocate elsewhere shouldn't impact. There's not a great deal of suitable premises available in the Bury area at the moment.

I'm not working tomorrow, 12 May but am around today and in and out next week.

Kind regards  
Ian

**Ian Burns** | Property Strategy Manager Eastern England

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**From:** Graham Hotchen [mailto:Graham.Hotchen@cds-cic.nhs.uk]  
**Sent:** 10 May 2017 14:25  
**To:** Burns Ian (NHS Property Services)  
**Subject:** FW: Strategic opportunity!

Dear Ian,

I am contacting you as Alison has mentioned below in relation to a potential premises move that has been necessitated by our current landlords requiring us to vacate our existing premises at Blomfield House in Bury St Edmunds at very short notice. I am compiling a business case in conjunction with NHSE (Julie Bradshaw) to move to another premises which would "fit the bill" extremely well. I would welcome the chance to have a brief conversation with you since I obviously want to make sure that any plans we have are in line with STP direction of

travel and fit with other strategic intentions you may have. Chris Palmer recommended I speak with you and Alison said that she knew you so hence the contact. I am happy to travel to your offices if that is convenient for you.

Best wishes,

Graham  
07816 669201

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**From:** Alison Reid  
**Sent:** 04 May 2017 16:59  
**To:** Ian Burns ([Ian.Burns@property.nhs.uk](mailto:Ian.Burns@property.nhs.uk))  
**Cc:** Graham Hotchen  
**Subject:** Strategic opportunity!

Dear Ian

Apologies for yet another email...having just caught up, one of my colleagues , Graham has been recommended to speak to you regarding the strategic intentions with in the STP for the East of England with a specific focus on Suffolk.

I hope you would be okay with Graham contacting you directly as we have been given notice on our occupancy in a building in Bury and are developing the options for an alternative which ideally we want to provide. Obviously even though Community Dental Services are a very small part of any system we want to ensure our plans do not conflict with the strategic intentions within the STP

Your advice and support would be very much appreciated

Thank you for whatever help you can offer Graham

Kind regards

*Alison*

Alison Reid  
Chief Executive Officer



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