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WORKING PAPER 2



West Suffolk
Clinical Commissioning Group

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C Vince
Planning Officer
Planning Development
West Suffolk Council

Via Email: connor.vince@westsuffolk.gov.uk

Dear Mr Vince

Planning Application: DC/20/0784/FUL – Doctors Surgery 10 The Chase Stanton

West Suffolk Clinical Commissioning Group ('the CCG') have been advised by Stanton Surgery that the above-mentioned planning application was considered by West Suffolk Council's Development Control Committee during the meeting on 5 August.

The practice has advised that the decision reached by the Committee during the meeting was 'minded to refuse' the application. We understand that the concern related solely to the inadequacy of the site from a car parking perspective and the consequential effects on highway safety. Subsequently, there will be an extension of time to the determination deadline to enable the Council to conduct a risk assessment and represent the application at a later date to the Development Control Committee. West Suffolk Clinical Commissioning Group were not in attendance at the committee meeting. However following notification of the outcome, we have sought to review the online recording to further understand the concerns raised and seek to provide any necessary clarification or further information.

As the Commissioner of Primary Care services for Suffolk, we wish to state that if the extension for Stanton Surgery does not go ahead, this will have a detrimental impact on the 6,227 patients of the surgery and may ultimately mean the patient list is closed. Patient List closure would then impact local surgeries who are also over capacity.

In relation to parking availability for the surgery. We note that Highways provided no objection to the Planning Application but understand the Committee have concerns regarding the availability of parking spaces, particularly considering Policies DM41, DM2g 5 and 6 from the National Planning Framework which recommends 40 spaces are available. The NHS comply with Health Building Note guidance which recommends 1 space per 2 Medical staff, 1 space per 3 non-medical staff and 2 spaces for each consultation, examination, treatment and therapy room. On this basis, we acknowledge the current arrangement of 13 spaces does not meet the HBN recommendation of 24 spaces. Unfortunately, this is not an unusual situation across our Primary Care estate due to the nature of the premises in which services are offered, but at the same time the necessity for said premises to be located very close to the communities they serve.



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We would like to point out that our surgeries in Suffolk intend to continue offering digital consultations where appropriate and therefore the requirement for car parking will be reduced. The Committee also referred to car parking arrangements for 3 local practices by comparison, Botesdale, Woolpit and Ixworth who have 40 spaces each. The CCG can confirm that this is in line with the patient list size for these Practices having weighted list sizes of between 3,800 and 8,675 more than Stanton Surgery.

As part of the development West Suffolk Clinical Commissioning Group are in negotiations with NHS Property Services to acquire several car parking spaces at the Stanton Health Centre opposite.

We note as part of the discussion during the committee meeting the timing of the planning application submission was raised, with a suggestion this had been made to coincide with reduced on-site activity due to the COVID-19 pandemic. The CCG would strongly refute this assumption and can confirm that the planning application was made at the appropriate time during the lengthy Business Case process and it was coincidental that this occurred at a time when a change to online consultations for patients at the surgery took place.

Finally, we would like to ensure the CCG's position is clear in relation to discussions around a potential new 'health and community hub' being explored by Suffolk County Council and raised at the Committee meeting. The CCG has indeed been involved in several conversations over the last 12 months with both Councillors and Local Officers of the Suffolk County Council Property team. However, to clarify our position, whilst the CCG has always acknowledged the Council's proposals, we have maintained throughout the discussions that we continue to support Stanton Surgery's current estate scheme through the business case process.

To finalise our response, whilst we understand due process needs to take place in relation to a resubmission of the planning application, we do hope this can be successfully resolved to enable full planning approval in a timely manner. There are very tight and strict time constraints in place on accessing NHS capital and delays within the approval process may lead to funding being withdrawn.

If the extension cannot go ahead, the surgery has informed us they may need to close their patient list. As the planning permission on their portacabin ceases in October this year, they may also have to remove this clinical space and divert some existing patients to other local surgeries who are also at capacity. During a particularly challenging period due to COVID19 we hope to avoid this situation at all costs

I do hope the points raised clarify the CCG's position in relation to the decision for planning and the points raised at the Development Control Committee of 5 August 2020.

Yours sincerely

Ed Garratt
Chief Executive