



## **Burnham Save Our Surgery Action Group Response to the Patient Participant Group (PPG) Briefing to Burnham-on-Crouch Town Council. 19<sup>th</sup> January 2024**

### **1. Accessibility Has Been Ignored**

We are appalled that although the briefing lists main points, the PPG ignores one of the most significant issues of all – the absolute inaccessibility of the Burnham Waters site (or most out-of-town sites) for many. The site is well beyond the walking capabilities of most able-bodied people, there is no public transport, and there are no continuous, unobstructed pavements.

Burnham's elderly residents, anyone with a disability or vulnerability, those pushing a pram or pushchair, or patients without enough money for a taxi or car will have no chance of easy access to a GP or a relocated pharmacy. They will be cut off from primary health care services. The site is car-dependent and if the Surgery moves there, it will lead to an increase in noise, pollution, and traffic hazards.

The initial results of a local survey launched by us show that 84% said the move will make it harder to see a GP. Anyone responsible for healthcare knows that distance can result in poor access to general practice services, which increases pressures on the health system more widely and can mean poorer outcomes for patients. And that easy access to GP services is important in closing health inequality gaps.

The move from Foundry Lane to Burnham Waters will disproportionately impact those who are disabled, elderly and living in poverty.

### **2. The HealthWatch Public Consultation Must Be Contested**

The survey was paid for by the GP Practice, which also drafted the questions which is why the consultation is biased, unethical, discriminatory, and invalid. We have asked Healthwatch to withdraw and review it. We are deeply disappointed that the PPG has not challenged it. HealthWatch and GP surgery should be transparent about who has paid for this consultation. An independent public consultation needs to be commissioned as a matter of urgency.

The questionnaire implies that certain services will be cut if the surgery doesn't move to Burnham Water-s this is scaremongering. The PPG admit that patients have challenged the survey. We and patients have not been told how the evidence was collected to assert that it is necessary that certain services be cut at the Surgery's current location. Neither the GP Practice, Healthwatch nor the PPG have responded to patients' valid concerns about this survey.

### **3. Unsubstantiated Information Is Being Used**

Information about the potential increase in patient numbers and the sort of Surgery needed in the future is quoted in the PPG Briefing but we and patients have never been told what those projections are based on, despite our repeated asking. The projections and many other assumptions are also in the GP's Position Statement, published in November 2023, but without precise references nor clear justification. The numbers do not add up. So, we are shocked that the PPG believes that the Position Statement is 'setting out the facts' and takes against patients who suggest it is scaremongering.

We have asked the GP Practice for substantiation of all the facts underpinning the Position Statement but we have not received this information. We have undertaken and published our own thorough rebuttal of the Position Statement, pointing out the many inconsistencies, incorrect information, and unfounded assumptions. Have the members of the PPG read this rebuttal? Neither the GP Practice, the ICB, Essex County Council nor Maldon District Council have responded to our rebuttal. We have asked for the GP Practice Position Statement to be independently audited, but the GP Practice has not responded.

We are aghast that the PPG is aligning with the GP Practice and health bosses in allowing the next 20 years of good health care in the Dengie to be based on data and assumptions that do not make sense. In doing so it is enabling those in power and authority to obscure data and facts, to camouflage real intentions, and to gaslight those who challenge them.

### **4. The Options Appraisal is Flawed**

The PPG refers to other site options for the Surgery and to the 2022 NHS-funded Options Appraisal, which looked at some of these. But the PPG does not mention that the Options Appraisal's main method of looking for new sites was simply to do a 'web search': it did not, as the PPG briefs, explore all realistic, potential sites in Burnham. The fact is that no one has yet undertaken a full and utterly thorough review of all the options. The Appraisal it also littered with errors, including advising that access to the Burnham Waters site is 'good' and that the site is 0.5 miles from the train station and 0.2 miles from library bus stop. All clearly untrue.

The 2022 NHS-funded Options Appraisal is a poorly organised report containing high-profile errors. That the PPG might be repeating the propaganda contained in it is distressing.

### **5. Burnham Waters**

The PPG says that Burnham Waters appears to be not progressing to phase 2 of the development until the Surgery position is clear. This very telling comment neatly sums up in whose interests the move is: Burnham Waters is obliged by planning conditions to provide a medical centre and promised the community a new private one; we believe Burnham Waters now needs the NHS Burnham Surgery to save on the high cost of staffing and running its much-lauded private medical centre; and a gold plated 20-year lease from the NHS will improve its financial position and burnish its commercial interests. The 2022 NHS-funded Options Appraisal found in its conclusion that the proposal to move to the Burnham Waters site is 'attractive to developers.' Local health needs are being sacrificed for commercial reasons.

It is clear to us that the GP Practice wants the current consultation to result in there being no other alternative than a move to Burnham Waters - as the PPG says, after that consultation is over it can finally move to a formal proposal for relocation. Despite all involved having called the proposed move a 'rumour', the PPG Briefing reinforces that they were just treating patients and residents as fools.

## 6. Role of PPG

A PPG is supposed to 'ensure patients, their families and carers are represented and heard from all stages of their treatment'. However, this statement is merely an echo of the Surgery's Position Statement, and no impartiality is indicated and instead Surgery partners' and developers' interests are being promoted. We are deeply disappointed that the PPG is performing in such a manner and wonder at what level of participation the PPG operates-

- **Nominal participation** is often used by more powerful actors to give legitimacy to development plans. Less powerful people become involved in it through a desire for inclusion. But it is little more than a display, and does not result in change.
- **Instrumental participation** sees community participation being used as a means towards a stated end – often the efficient use of the skills and knowledge of community members in project implementation.
- **Representative participation** involves giving community members a voice in the decision-making and implementation process of projects or policies that effect them. For the more powerful, representative participation increases the chances of their intervention being sustainable; for the less powerful, it may offer a chance for leverage.
- **Transformative participation** results in the empowerment of those involved, and as a result alters the structures and institutions that lead to marginalisation and exclusion.'

[Levels of Participation | Participatory Methods](#)

## 7. Conclusion

The PPG Briefing dismisses and ignores what most patients and residents have been saying loud and clear: that moving the Surgery to the Burnham Waters site will make essential primary health care services inaccessible; that the GP Position Statement and the 2022 NHS-funded Options Appraisal are inferior and confused documents that must not be used for long term health planning; and that GPs and health bosses must not impose a deeply unpopular and potentially dangerous relocation on patients whilst closing all the much appreciated pre-existing facilities within the town. Look at what an interested party closely involved in the SWF Crouch Vale Medical Centre situation told us, "don't be taken in by 'management talk' – take it all with a very large pinch of salt. What you need is a commonsense solution that suits the great majority."

We include below our original published response to the original GPs' Position Statement for those who haven't read it.



## **Burnham Save Our Surgery Action Group**

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# **Burnham Surgery Position Statement Will Lead to Patients Being Left 'High and Dry'**

**12 December 2023**

On 29 November 2023, following months of speculation, the Burnham Surgery released a position statement about the future of its services. The summary claimed that because the Surgery premises do not meet current guidelines and have inadequate space and facilities for it to meet NHS contract requirements, a new building in a new location will accommodate all health services for Burnhamon-Crouch and the surrounding area and allow the disposal of the Burnham Clinic and the Burnham Surgery. A full position statement confirmed that the new site will be at the controversial Burnham Waters Retirement Village some two miles from the town centre and with no public transport.

**Burnham Save our Surgery** action group has studied the position statement as well as the 2022 estate Options Appraisal commissioned by the (then) NHS Mid Essex CCG on which it is based. We are alarmed at many of the reasons for, and benefits of, a disruptive relocation to a remote site that will make primary health care services inaccessible to many patients and will result in worse health outcomes in the community. The position statement reveals that the delivery of future medical services will not be based on whether they are close to where they are needed and where most people live, but rather on delivering them where it is cheapest and most convenient for practitioners, decision makers and others involved in public health care provision. So, in whose interests is the move?

We believe that the Practice is not being transparent in the position statement and that it is an act after the fact, justifying a relocation plan that is well advanced. Health decision makers have dismissed and ignored what residents have been saying loud and clear. This is contrary to NHS principles to be accountable to the public and patients that it serves and to put patients at the heart of everything it does.

There is a lack of proper evidence and sturdy back up throughout the position statement. For example, there is no accurate assessment of the transport implications of the move. How will patients get to the new site? Will the move result in lost lives as some people give up on trying to get to the GP since it will be too difficult for them? The Options Appraisal uses incorrect information about transport options. And, while there is much talk about state-of-the-art new premises, there is no plan for how to find and retain the health professionals to fill it. The country has an NHS recruitment crisis, and a big new building in a remote rural location, without the people to staff it, will be a betrayal of the community.

Residents of Burnham are disgusted by the proposed move, which disproportionately affects socially, physically, economically, and mentally marginalised groups. The position statement does nothing to allay fears and anxieties.

It is a poorly argued case for the relocation: it appears to be rushed, inaccurate, inconsistent, and quick to let speculative and predatory private interests dictate the Surgery's future. It contains speculation and assumptions. In the following pages we challenge many of the points made in it. We are calling for the Practice to come clean and let the people the move will affect most – the patients – determine the location and shape of their local health services, with a common-sense solution that provides a comprehensive service available to all.

## **1. The Numbers Do Not Add Up**

The first section of the position statement gives the current patient list size as 9,635. It then gives clinical staff as numbers, but not as whole-time equivalents (WTE). We have been given the WTE numbers by Healthwatch Essex and they show a different picture. In the numbers of GP appointments, we are not shown any information about the split between face-to-face and telephone appointments. There is mention of administrative staff throughout the document, but there are no numbers available, either whole numbers or WTE.

The position statement says that the Surgery will need to provide services for up to 14,000 patients, to support development growth to 2029. But there is no source for this +45% increase and no information about where those 14,000 patients will live. Where is this data from, and why is it a particular driver for the move to the out-of-town site? The May 2022 Project Initiation Document to carry out a formal Options Appraisal says the Surgery predicts an increase of 701 patients by 2024 – +7% vs current figures. The Options Appraisal of November 2022 mentions adequate space is needed from which to provide primary care services for up to 12,000 patients to 2029. Good data is the lifeblood of good health service planning, and the position statement fails to provide it.

There is an opening comment about where patients live, saying some 48% live "before the railway bridge" and 52% live "after it." We assume that the Practice is trying to say that people who live "after" or, more accurately, north of the railway bridge must be nearer to Burnham Waters than the current Surgery, which is clearly not true in most cases. It offers no insight into where the population is distributed in relation to the Surgery, how they currently access the Surgery nor how far most patients will be from the proposed new site.

In fact, 2021 census data of the population density of Burnham, overlaid with data showing places that are within a 20-minute walk (for a healthy adult) of the proposed new site, shows the overwhelming number of residents will have a minimum 40–80-minute return trip walk to get to a see a GP if the Surgery moves. Well beyond the capabilities of most people. Dan Doherty, Alliance Director NHS Integrated Care Board, said in August 2023 that "the facts at the present time are that 80% of the patients registered with Burnham Surgery come from within what I would call the Burnham North and Burnham South town. That is a fact." He confirmed that only a small percentage of patients come from the surrounding areas, such as Althorne.

We request that an independent audit is carried out on the data used in the position statement.

## **2. The Position Statement Does Not Make Sense**

The next section contains a summary of an NHS Estates commissioned survey of the building, undertaken in July 2022. which apparently showed the premises to be non-compliant with current standards and in need of major work within the next five years. We have not seen the original report.

There is a list of nine concerns about the premises that require major work. But most of these works, such as the replacement of window glazing and acoustic door seals, can be carried out on the current site, with investment. They do not justify a calamitous relocation of premises to an out-of-town site, and it is disheartening that Practice is prepared to present these repair concerns as such.

The position statement lists twelve further issues. We understand that most were not in the NHS Estates commissioned survey of all NHS buildings July 2022. The issues, including no lockable spaces for personal items, non-compliant taps, poor sanitary drains, a slope into the building that is too steep for wheelchairs, and a leaking roof, are ongoing repairs, maintenance and reinstatement works, that should be easy enough to fix as part of keeping the property in good repair in collaboration with the landlords.

The NHS commissioned Premises Review undertaken in June 2022 did not identify anything in the Surgery that runs a serious risk of imminent breakdown, and only three items that are operational but major repair or replacement may be needed soon and are high risk (inside sanitary fittings, paving, and carpark works). Does the position statement seek to present the Surgery as seriously degraded as leverage for a move to a new building at a new location?

Other listed problems seem more complex, particularly those which relate to Health, Safety and Welfare Regulations. However, why is the Practice insistent on providing all services, mandatory and non-mandatory, from the same physical location and why have they not considered the principal of co-proximity as an option to relocation? Staff training does not need to take place in the same building as clinical service delivery. Back-office administration does not need to be co-located with frontline delivery. Supplementary clinical rooms and services could be provided on a satellite site. Burnham Clinic has been used for many of these purposes in the past. Yes, it's pleasant to have everything together, but not a necessity for good health results. Technology can provide access to online information across separate buildings. Nothing apparently happens in the Surgery in the evenings or at weekends, so why can't hours be extended on the existing site?

Infection control is listed once in the position statement, as an adjunct to having non-compliant taps in clinical rooms. Yet at a public meeting organised by Burnham Town Council in August 2023 Carol Banham, Burnham Surgery Practice Manager, raised that infection control was a driver for relocation and a reason why the Burnham Clinic was not suitable. In 2022, the request for release of funds secured by a section 106 agreement to pay for the estate Options Appraisal stated it was needed to help the practice ensure an infection control compliant Surgery. Just over a year later, infection control has more or less disappeared from the agenda. Why do the goal posts move so much?

We have heard of the issue of training and a training contract before. However, since decision makers have not shared the criteria for an NHS training contract nor any detail of the day-to-day issues here, we remain in the dark about why training is a driver for a major relocation.

The position statement is not an evidence-based and rigorous account of the key issues. It points to decision makers being disingenuous about the real motivation for a relocation to Burnham Waters and wanting to justify a decision already made hand in hand with one questionable developer and with no public consultation.

### **3. The Timeline Exposes Poor Management and No Public Engagement**

The timeline in the statement sounds an alarm about the efficient management of our primary care health services and shows a disregard for public engagement.

While the Practice raised the issue of surgery premises with the Mid Essex Clinical Commissioning Group in 2017, it was advised to wait until three years before the lease expiry date (23 March 2023). The Practice had already met with Burnham Town Council in 2021 to update them on the pressures that the Surgery was under due to the increase in house building in the area. The fact that the town's services would not be able to cope with developments built over the past decade or so has been noted by the NHS. Why has everything been left so extremely late in the day, if NHS decision makers were serious about maintaining a Practice in the centre of town and within the reach of most patients?

An NHS Estates-commissioned survey of all NHS buildings was undertaken in 2022. An estates Option Appraisal was finally commissioned in May 2022 and reported its results in November 2022, to look at how the built premises were coping. The Practice only shared this Options Appraisal in December 2023 after mounting pressure from local people. Neither the position statement nor the Options Appraisal set out to explore the health needs of the local community: they are about bricks and mortar.

There was no public consultation on the Options Appraisal and residents and patients were not even considered to be stakeholders. Despite Freedom of Information requests, the Mid and South Essex Integrated Care Board (ICB) refused to share the Options Appraisal, even redacted for confidential information. As recently as November 2023 the ICB was making repeated claims that concerns about the relocation were based on rumour and that no decision had been made. Their true intent was only revealed when the position statement was released. This gaslighting is a breach of a core NHS principle to be accountable to the public, communities, and patients that it serves.

The Practice has admitted that discussions with Think Green Land Ltd first started in 2017, with the developers contacting the (then) Mid Essex Clinical Commissioning Group in 2021 with the offer to build new premises. Confidential discussions must have been going on for some time, since Jamie Macock of Think Green Land Ltd has said that he knew the Practice might lose its training licence, and that the Surgery building was condemned. He claimed that if the Surgery did not move to Burnham Waters it would not exist in three years' time. In 2022, decision makers were talking with Burnham Waters about the car parking spaces needed to accommodate the relocation of the Surgery to the site, and in January 2023 the developer had communications with Maldon District Council related to providing the parking spaces and infrastructure the Options Appraisal said were needed. It made a formal planning application in November 2023. That this process has been so shrouded in secrecy from patients is a disgrace.

Finally, how can a valued NHS Practice, supporting more than 9000 patients, get to the point where it is suddenly operating out of what it claims are crumbling, unsafe premises and the only option now is to rush into an agreement with a private developer? The Practice declares it must sign a letter of intent with Burnham Waters otherwise the developer will build houses on the site offered to the Surgery. Even though converting the planned medical centre into housing would require a new planning application, necessitating time and without a guarantee of success.

#### **4. Decision Makers Must Reconsider the Options**

The position statement presents only two serious options: stay on the current site and make significant sacrifices or move to new premises at Burnham Waters.

Unlike the Practice, the Options Appraisal recommends exploring the Endeavour Way development as the best route forward for a new build. However, the Practice dismisses this solely on the basis of

cost, without any indication that decision makers have explored every single avenue to mitigate or overcome some of those cost implications.

Furthermore, the Options Appraisal concludes that improving and upgrading the current Surgery, along with the Burnham Clinic and /or the Fire station site, remains an acceptable option and meets some or many of the requirements going forwards– so should not be discounted. The Appraisal also notes that 15 clinical rooms are needed for core GP services for a 14,000-patient list. The Surgery already has 12.

We are worried why the Practice and those involved in the Options Appraisal did not make a more imaginative site search for a new build site if they felt that was what was needed. Developments were being planned in Burnham years ago, with estates built on Southminster Road, by Pippins Estate and off Maldon Road. There is land on developments south of Marsh Road. The nearby Station House, leased by Burnham Town Council, is empty. Given that the Practice has been looking to make estate improvements since 2017, it is incredulous that decision makers have only been able to secure one viable new site with one developer partner.

Why haven't decision makers more extensively explored co-proximity, offering satellite services, going to other villages with community outreach, and using existing improved and upgraded premises to a far greater capacity?

The extent of the risks that the publicly funded NHS would take by committing to a long-term financial arrangement with Burnham Waters have not been made clear in the position statement. The Options Appraisal points out that the developer does not own the site on which the new Surgery would be built on, that the site cost is unknown and that there are delivery risks when working with third party developers. Burnham Save the Surgery action group has warned the Practice that Burnham Waters, based on its track record, is an unreliable partner that has engaged in disrespectful language about the community and, allegedly, private financing flows to it are now being tightly restricted.

### **The Current Site**

The case made against staying on the current site is laced with menace and threats which are not substantiated. The statement offers the harsh prospect of closing the list, cutting services, and reducing the catchment area if the Surgery has to stay in Foundry Lane, but offers no meticulous analysis as to why this should be the case.

This list of hazards is inaccurate. The Surgery has no need to factor in the complex needs of future care home patients, since the planned care home at Burnham Waters is being eliminated. The application to remove the care home was received by Maldon District Council in November 2023 and is public, so why is it still being referenced here?

Many risks listed are speculative, with plenty of things that could happen. Statements such as the “practice would be financially unviable” and “the CQC could downgrade the practice’s rating”, leading to “loss of staff”, seemed designed to alarm people, as are the mentions of Virgin or Commisceo being brought in to run the surgery.

The position statement leaves questions unanswered. Why is the Practice unwilling to enter into a new lease with the current landlords? Why would the NHS refuse to continue to reimburse the lease cost and business rates on the building?



The fact that private landlords would still own an improved Burnham Surgery is listed as a reason not to stay on the current site. Yet, Burnham Waters will, as far as we know, own a new building on their out-of-town site and will benefit from any increase in its value and from a gold plated 20-year lease from the NHS. It will also guarantee the delivery of the medical centre the developer is obliged by planning conditions to build, with no need for the developer to staff and run it. It is clear why Burnham Waters needs our Surgery on its site, but it remains unclear how it will benefit patients.

We take serious issue with the declaration in the position statement that talks with the developer of Burnham Waters commenced after estates committee agreement in early 2023. We have shown that discussions have been going on for longer. The developer has said it knows confidential information about the move that has not been shared publicly. So, we ask, what is there to hide?

A startling claim in the position statement is that the developer will build houses on the site offered to the Surgery if the Practice does not sign a letter of intent. This is flat-out implausible. The developer is obliged by planning conditions to build and staff a medical centre (always intended to be private in a self-contained retirement village and including an optician and dentist). If it wants to make any changes to those commitments, to build houses, it needs to make a new application to Maldon District Council, with no guarantee of success. The position statement tells us - residents, taxpayers, patients - that our NHS must bend to builders' threats.

One of the most egregious aspects of the position statement is that just nine words are devoted to patient opposition to the out-of-town site. This is a real betrayal of the wishes of residents and a shoddy reflection of their lived experiences. There is enormous local opposition to the move and there are well-founded concerns it will significantly increase health inequalities and result in worse health outcomes. Over 3,000 people have signed a petition objecting to the move. Sir John Whittingdale said that a public meeting organised by Burnham Town Council to discuss the matter was the largest public meeting he had seen in 30 years of being MP. Hundreds of people supported a march on 4th November to protest the relocation. The initial results of a Survey launched by Burnham Save our Surgery action group shows that 98% disagree with the Surgery moving from Foundry Lane to Burnham Waters and 84% said it would make it harder to see a GP.

There is much talk of care closer to home (being able to bring hospital consultants and other health professionals to the Surgery). This could happen in the current Surgery or satellite sites and did happen years ago, at weekends. The use of the term care closer to home in the context of moving the Surgery miles away is outrageous. Town centre sites are close to home for most patients.

### **The Burnham Waters Site**

The position statement claims the relocation will offer improved services to the population but does not give evidence that these additions are wanted or needed, nor what special facilities each requires. The Options Appraisal says that a particular service need is to help an older population to remain able to stay in their own homes for longer. Yet, it is elderly and vulnerable patients who will struggle most to access the proposed out-of-town site.

The position statement says that as more professionals are employed by the Primary Care Network, the building on the Burnham Waters site is needed to accommodate them. Twelve roles are listed. On the same note, much is made of providing more facilities for outreach workers. Yet there is no evidence that these professionals are available and ready for employment, no published plan for their recruitment and retention, and no statistics on vacancies in our area. In the 2018 consultation on the Burnham Waters planning application, the NHS raised a concern over the problem of recruiting GPs and other staff. The health service is in its worst staffing crisis, making it difficult to

provide needed patient care, and there is little in the position statement to counter a widely held view that that the relocation will result in nice new rooms with no one to work in them.

Parking space for the Essex Breast Screening Mobile Unit is listed as a benefit. This cannot be a reasonable justification for a move since the Unit only needs any accessible carpark, which it already has in the centre of the town.

The position statement claims that the relocation aims to support the influx of over 55s from the Burnham Waters Retirement Village. We are shocked that this pretext is used. Burnham Waters is intended to be a self-sufficient, making as few demands as possible on local health services. When planning permission was granted, it was stated that the Burnham Surgery was not in a position to take on the additional demand. The developer agreed with the NHS that its private medical centre was intended to address, in their entirety, the primary health care needs of the residents of the Village. The developer also made a commitment to cash for local GP services if demand for health care from its residents was a burden. It is misguided to now suggest a move to Burnham Waters is needed to look after the residents there. The very opposite was assured by the developers and the Local Planning Authority, and it is wrong to put forward this idea.

The statement mentions offering digital and virtual access for people to secondary care appointments avoiding 1h+ journeys. But there is no information about how many people are making a journey that long, when in fact 80% of patients live in Burnham. And why does this service need a dedicated area in a new Surgery?

Another proposed benefit of the move is to provide patients with access to late clinics, weekend clinics, telephone, video and online. But why can't these be provided from the current site or additional satellite premises?

Many other benefits mentioned are achievable now, such as confidential rooms, a walk around couch, interactive information boards, support for patients in their own home, a central consumables store, hearing loops, late clinics, weekend clinics, telephone, video and online clinics, online prescription ordering (happening now) and using social media.

It seems strange to suggest that the provision of a secure dispensary collection point, operating 24-7 allowing patients to collect their medication at their convenience, is a benefit of the new site. Surely the proposed location will make it more difficult for patients to get their prescriptions. Even if extended hours mean patients can get a prescription later or earlier, who will book a taxi or walk 4 miles to pick up their prescription at 10pm on a dark winter night? Why can't a secure dispensary collection point be provided at the current Surgery, given there is now empty pharmacy space?

A town centre Surgery acts as an anchor for other essential services, and there is no mention of whether the relocation will result in the closure of Savages Chemist (and the town's only Post Office). This would hollow out Burnham and leave most residents without easy access to vital dispensary and other services.

## **5. Transport Has Been Ignored**

The position statement does not mention that the Surgery is currently located close to rail and bus links and is close to where most patients live. The Options Appraisal touches on it only briefly. The move will mean patients will have to walk some four miles return trip to the Burnham Waters site, use a private car, or pay for taxi (which are hard to get in Burnham) to visit a doctor as there are no public transport links. Essex County Council has confirmed that that the walk is well beyond the normal walking thresholds of most able-bodied people. There is good evidence of an association

between worse health outcomes the further a patient lives from the healthcare facilities they need to attend.

Astonishingly, the Options Appraisal states that access is good with a bus stop proposed opposite the proposed medical centre site. It also deems that access by car, bus and on foot meets many elements of Critical Success Factor assessment. It says Burnham Waters is 1/2 mile from train station, which it very clearly is not. These findings discredit the Appraisal, since the proposed site is not accessible on foot, (there is no continuous pavement, and the pavement where it exists includes obstacles such as telegraph poles preventing access to disability scooters, buggies and prams), there are no regular public buses serving the route and absolutely no plans to provide them, and increased car use will cause significant problems in the area (see below). None of this has been considered. This looks like an appalling case of public health service planning done on the back of an envelope.

The successful planning application for Burnham Waters included a supporting Transport Assessment, supplied in 2018. This assessment, traffic modelling and trip generation analysis evaluated the impact on local highways on the basis that the services on-site, including a GP surgery will not be available to the public – these services are for residents of the development only.

The Highways Authority admitted that the rural location of the site is such that access to other key facilities, public transport, employment, and leisure opportunities is limited, and for the vast majority of journeys the only practical option is the car. It said that the Local Planning Authority should take this into consideration when assessing the overall sustainability and acceptability of the site.

If the Surgery moves to the Burnham Waters site the development would be a busy, open location visited by patients from across the Surgery catchment area and, therefore, the previous assessment of the impact on local highways would be invalidated. All patients would need to get to a remote rural site really only accessible by car. The additional traffic would have a detrimental impact on the surrounding highway network, interrupting the free flow of traffic and upsetting road capacity. This might also increase accident risk, exhaust and particulate pollution, and compromise the well-being of local residents.

The National Planning Policy Framework states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. And that any major new proposal should ensure that safe and suitable access to the site can be achieved for all users. Applications for development should also address the needs of people with disabilities and reduced mobility in relation to all modes of transport.

Any bid to move the Surgery to the Burnham Waters site is liable to require a reassessment of the original planning proposal and necessitate further planning applications based on a new Highway Impact Assessment, Travel Plan and Transport Assessment. There is a risk that such an application might be prevented or refused if it looks like it will have an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. These significant issues are not mentioned anywhere in the position statement nor the Options Appraisal.

Transport is an essential part of access to health care and medicine, particularly for vulnerable and disadvantaged patients. To not include transport and accessibility risks in the position statement completely undermines it.

## 6. Crouch Valley Medical Centre Demonstrates the Dangers of an Out-of-Town Location

The position statement does not reference a neighbouring move of town centre GP services to a remote location: the Crouch Vale Medical Centre on the outskirts of South Woodham Ferrers (part funded by Sainsburys Supermarket).

The promised minibus for the new location failed to materialise and many patients have to rely on volunteers to drive them to GP appointments, make a long walk or book a taxi. A local doctor recently shared that the track record of the NHS decision makers for South Woodham Ferrers has been disastrous. And that many residents felt that no one would be stupid enough to close all the town centre facilities and force a one size fit all solution on patients. But they did - and that is just what the Burnham Surgery and NHS bosses are proposing to do.

A Burnham resident shared that she believes her elderly father would still be alive if his town centre GP in South Woodham Ferrers had not moved. Rather than having a short walk when he felt ill, he hesitated, waited, and then gave up on trying to get to the new out-of-town site, as it was two buses or a long and busy walk away. He eventually called an ambulance and later died in hospital.

A resident from the South Woodham Ferrers care setting who attended the opening of the Burnham Waters site in November 2023, warned about the implications of arranging support for people booking taxis to the proposed new site (as they cannot walk there) only to be turned down for an appointment once they arrive. The impact on older people who do not drive in South Woodham Ferrers has been horrendous.

After the 2019 move of health premises to the Crouch Valley Medical Centre, there was a small survey conducted in South Woodham Ferrers to see if the residents preferred the old system to the new. 70% preferred the old system.

## 7. In Conclusion

- **The numbers do not add up and an independent audit is needed.**
- **The position statement does not make sense.**
- **The process has been poorly managed, and patients' views have been disregarded.**
- **The Mid and South Essex Integrated Care Board has dismissed the public's concerns and denied them access to information.**
- **Transport and accessibility statements are desperately flawed.**
- **The position statement is not a proper risk-benefits assessment on which to base a 20year commitment to the Burnham Waters site.**
- **The relocation will create terrible health inequalities, cutting off many patients from access to health services.**

We believe that the position statement is based on unsubstantiated claims, unnecessary threats and problematic data. It shows utter lack of awareness of patient needs, as the result of the absence of any engagement with them. The Mid and South Essex Integrated Care Board and the Practice must reject it as a basis for decision making.

It is wrong to move the town's much needed and appreciated Surgery services to a remote, private gated site with no public transport - when its current location serves most patients perfectly. With serious planning and targeted investment, a town centre site or sites can be equipped to serve many more patients into the future.

## 8. References

1. The Burnham Surgery Position Statement can be found here:  
<https://www.burnhamsurgery.co.uk/index.aspx>
2. The Options Appraisal can be obtained from the Burnham Surgery
3. In 2022 a request for release of £15,360, secured by a section 106 agreement ref MAL14/00108/OUT was made to Maldon District Council to fully fund an estate Options Appraisal.
4. In November Burnham Waters Ltd made an application for non-material amendments to its planning permission 23/01119/NMA.
5. On 3rd November 2020 members of the Burnham Save Our Surgery action group gathered outside Burnham Waters Retirement Village during an opening event. Mr Moccock approached those outside, and he told them that if the Surgery didn't go to Burnham Waters it would be lost completely. He claimed that current surgery building is condemned, and that this information would be published soon. He told the group that the Surgery has lost its training contract.
6. Dan Doherty and Carol Banham spoke at public meeting organised by Burnham Town Council on 18th August 2023. Read the transcript of the public meeting here:  
<https://burnhamoncrouchtowncouncil.gov.uk/wp-content/uploads/2023/08/TRANSCRIPT-ofBurnham-Surgery-meeting-at-Ormiston-18-August-2023.-By-Frances-Franklin.pdf>
7. The Burnham Save our Surgery action group Survey, launched in November 2023, can be found here:  
[https://docs.google.com/forms/d/e/1FAIpQLSdu5v4W3T4SHZ4YbjPD8ut74hez\\_c\\_ZKWpOuPZ-VHRZm07oIVg/viewform?fbclid=IwAR2SEAFdhCwu4TdreFLBmf3M\\_2ZoNQPgbmoIM1QW7AZ2xymd3grXfQH\\_\\_r4](https://docs.google.com/forms/d/e/1FAIpQLSdu5v4W3T4SHZ4YbjPD8ut74hez_c_ZKWpOuPZ-VHRZm07oIVg/viewform?fbclid=IwAR2SEAFdhCwu4TdreFLBmf3M_2ZoNQPgbmoIM1QW7AZ2xymd3grXfQH__r4)
8. In a letter from Kerry Harding, Head of Estates NHS England Midlands and East to Stewart Rowe of The Planning and Design Bureau Ltd, 27th July 2018, the NHS asked for reassurance that the medical centre planned would be private and staffed by GPs from outside of an NHS contract for the benefits of residents within the development. She said that the NHS expected any impacts on local NHS health services to be fully assessed and mitigated.
9. In a letter from Stewart Rowe of The Planning and Design Bureau Ltd to Kerry Harding, 1st October 2018, Mr Rowe confirmed the private medical centre is intended to be a privately funded resource...permanently available to residents of the site. And that it was intended to address, in their entirety, the primary health care needs of the residents of the Village.
10. Think Green Land Ltd entered into a Section 106 agreement with Maldon District Council and Essex County Council relating to land at Maldon Road intended for the Burnham Waters Retirement Village, 30th August 2019, which obligates it to certain legally binding conditions.
11. Cllr Lee Scott of Essex County Council confirmed, 21st February 2023 email, that Burnham Waters was designed to provide an environment for more senior citizens to lead their lives with an element of independence, but with key services (shops, private healthcare, etc) on their doorstep, wholly within the development. The development was planned to be self-contained and self-sufficient with the necessity to travel limited.
12. Highways Authority response to the original planning proposal for Burnham Waters (CO/HT/TPD/SD/BJ/MAL/32282 Date: 2 August 2018).
13. The National Planning Policy Framework (<https://www.gov.uk/guidance/national-planningpolicy-framework/9-promoting-sustainable-transport> ).