



HOUSE OF COMMONS
LONDON SW1A 0AA

Mr David Smith
Chief Executive
Oxfordshire Clinical Commissioning Group
Jubilee House
5510 John Smith Drive
Oxford Business Park South
Oxford
OX4 2LH

7 April 2017

Dear David

**Re: Formal response to the Oxfordshire Clinical Commissioning Group's
Transformation Programme Phase One consultation**

We are writing to you, as Members of Parliament for constituents in South Warwickshire who will be affected by changes to healthcare services in Oxfordshire, in order to formally respond to phase one of the Oxfordshire Clinical Commissioning Group's (OCCG) consultation on its Sustainability and Transformation Plans.

The Horton General Hospital in Banbury is the main provider of acute healthcare for our constituents in South Warwickshire living near the Oxfordshire border. As such it is changes to services at this hospital specifically that we would like to focus on in our response to the consultation, accompanied by our strong feelings on the process of the consultation and the level of engagement it has sought with relevant stakeholders in Warwickshire.

Process of the consultation

We would like to begin by registering our objection to the splitting of the consultation process into two phases. Not only do we strongly believe that the splitting hinders the ability of our constituents to put forward their views on the entirety of planned changes to NHS services in Oxfordshire, we also believe that the splitting could lead to respondents inadvertently precluding certain services from being consulted on in phase two due to their responses given in phase one.

One such example is the provision of acute stroke services at the Horton which is consulted on in phase one. Our constituents may favour enhancements in these services as part of their response to phase one, but are offered no explanation of the impact that a prioritisation of

resources for acute stroke services would have on other services provided at the hospital that are 'expected' be consulted on in phase two, such as A&E and children's services.

A further concern is that, according to the consultation document, "maternity services at the Horton General Hospital including obstetrics and the Special Care Baby Unit (SCBU)" are being consulted on in phase one, but Community Hospitals and midwife-led units are not 'expected' to be consulted on until phase two. We simply cannot understand how maternity services and midwife-led units, to which the Horton has been temporarily downgraded, are seen as distinct enough not to be consulted on jointly. Such a separation is extremely confusing for us and our constituents and makes it very difficult to respond to the consultation.

Engagement with relevant stakeholders in Warwickshire

We are not convinced that enough has been done by the OCCG to engage fully with relevant stakeholders in Warwickshire, including residents and local authorities.

We fully accept that there is no clear-cut way to define all those living outside the Oxfordshire county boundaries who rely on healthcare services provided by the OCCG. We appreciate, therefore, that it is not easy for the OCCG to identify every single one of our constituents who may nominally use NHS services in Oxfordshire in order to invite them to participate in the consultation. Nonetheless we are both considerably struck by the number of our constituents, those who would routinely expect use the Horton General Hospital in the case of an emergency, who have no idea whatsoever that this consultation is taking place let alone that there are considerable changes proposed to NHS services in Oxfordshire.

One does not need to be an expert in healthcare provision to realise that the lessening of any services at the Horton will have profound knock-on effects at other hospitals outside of Oxfordshire. Whilst many in South Warwickshire will be forced to make the longer journey to Oxford if certain services are discontinued at the Horton, many will also turn to Warwick. Whilst the consultation document admits that this is indeed the case, it does not make clear what involvement Warwickshire CCG and the CCGs in other neighbouring counties have had in being consulted on the plans put forward by the OCCG for consultation.

What is perhaps of even greater concern to us, however, is the lack of communication between the OCCG and local authorities in Warwickshire. There is in fact only one local authority in Warwickshire that borders with Oxfordshire, which is Stratford-on-Avon District Council (SDC). Consequently we are deeply concerned that it was not until March that the OCCG met with members of SDC's Overview and Scrutiny Committee despite phase one of the consultation beginning in January and SDC requesting that a meeting take place much earlier than March. This gave SDC little or no ability to raise concerns about the consultation on behalf of South Warwickshire's residents. We consider this to be completely unacceptable.

The continuation of obstetric services at the Horton General Hospital

The OCCG will know that we, along with other Members of Parliament whose constituents use the Horton, have consistently opposed the downgrading of the maternity unit at the Horton from a consultant-led one to a midwife-led one. **It therefore follows that we oppose the OCCG's proposal to permanently downgrade the maternity unit to being midwife-led and would prefer it to return to being a consultant-led unit in the interests of the safety of labouring mothers.**

Our main reason for opposing the permanent downgrading of the maternity unit at the Horton pertains to the augmentation of travel times that labouring mothers will be forced to endure should they not be able to give birth at a midwife-led unit. Furthermore we believe that the travel analysis presented in the consultation, which forms the basis for justifying the safety of the OCCG's proposals to centralise services at the John Radcliffe in Oxford, is inherently flawed and bears little or no resemblance to reality.

The consultation's travel analysis appears to rely on Google Maps and is misleadingly optimistic about the length of time taken to travel from the vicinity of Banbury to the John Radcliffe. The analysis also takes no account of the time taken to park at the John Radcliffe, nor the time taken to walk from the car to the relevant hospital department. Victoria Prentis MP has helpfully surveyed her constituents in the Banbury constituency and found that it takes those in North Oxfordshire an average of 80 minutes to travel to the John Radcliffe from their homes with parking times varying between 10 and 50 minutes (there were 274 responses).

These times are far in excess of those presented in the consultation's travel analysis and would render the OCCG's proposals to centralise obstetric services at the John Radcliffe potentially dangerous. Our constituents live even further from the John Radcliffe than those of Victoria. As aforementioned, many would be forced to make the journey to the obstetrics unit at Warwick Hospital. However we genuinely fear for those of whom the John Radcliffe would still be the closest obstetrics unit if the Horton were permanently downgraded.

We strongly believe that the consultation has not represented the reality of travel times and is therefore not representing the true consequences of what a permanent downgrading of the maternity unit at the Horton would mean for labouring mothers. We fear that the OCCG are underplaying the seriousness of their proposals and have misinformed the public with regards to travel times.

Conclusions

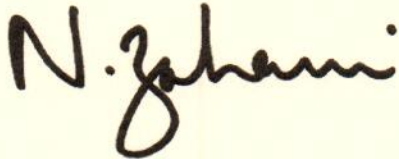
Our overall response to the consultation is that it is entirely flawed. The splitting of the consultation into two parts does not allow our constituents to be consulted on the full package of healthcare reform in Oxfordshire and potentially misleads them into precluding certain services that are due to be consulted on in the second phase. Despite Warwickshire residents being significant stakeholders in this whole exercise, efforts to engage with them have been

at best minimal and at worst seemingly reluctant. This is exemplified by the OCCG's inability to meet with Stratford-on-Avon District Council until around two thirds of the consultation period had elapsed.

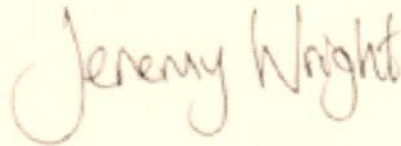
We have registered our opposition to the OCCG's proposal to centralise obstetric services at the John Radcliffe and permanently downgrade the maternity unit at the Horton. We believe the consultation's empirical evidence around travel times is incorrect and that it therefore negates the assumptions made by the OCCG when considering the safety of their proposals to centralise services at Oxford.

We very much hope the OCCG will take strong notice of our response on behalf of our constituents in South Warwickshire.

Yours sincerely,



Nadhim Zahawi MP



The Rt Hon. Jeremy Wright QC MP