



Merton

Clinical Commissioning Group

Merton CCG

5th Floor

120 Broadway

London

SW19 1RH

020 3668 1221

Tara Butler
Deputy Manager
Future Merton
London Borough of Merton
Merton Civic Centre
London Road
Morden SM4 5DX

Correspondence sent by Email

28th January 2019

Dear Tara,

Merton Local Plan Consultation - response on behalf of Merton Clinical Commissioning Group

This representation forms the formal response on behalf of Merton's Clinical Commissioning Group to the consultation on the borough's Local Plan consultation. The Council's commitment to improving the health and wellbeing of the community and the recognition of the contribution the planning process can make is welcome.

While this letter sets out comments on specific policies and issues within the consultation document, we hope to continue discussions with the Council to ensure the plan reflects the challenges and opportunities for the health service and maximises its support for good health (physical and mental) and the wellbeing of the borough.

Where possible comments are set out under the relevant chapter/section for ease of reference, however some do not necessarily fit within this format. Where we suggest specific wording alterations/additions these are shown in red italics.

Growth expectations over the plan period

The Mayor's draft London Plan's housing targets for the borough comprise 1,326 pa for the next ten years. However, the consultation document sets out a minimum of 6,165 for the 15 years 2020 – 2035, an average of 411 homes pa

Given the challenges in reconciling expected population growth and identified opportunities for housing growth, it will be important from a health perspective to maximise opportunities to improve health and well-being and to minimise potential adverse impacts. On this basis we are pleased to see the requirement for Health Impact Assessments (HIAs).

The Vision and Strategic Objectives

We welcome the spatial vision's inclusion of "the embedding of health and wellbeing into all aspects of development" in paragraph 1.20 and Healthy Places forming the first strategic objective. Paragraph 1.21 sets out the improved outcomes for the community, and we suggest adding 'improved health and well-being' or 'reduction in health inequalities' to establish the positive vision from effectively embedding health and wellbeing.

Strategic Objective 1 Healthy places

There is no reference to the assessment of development proposals to maximise the benefits to health and wellbeing and avoid, minimise or mitigate adverse impacts. This would be the process needed to 'embed health and wellbeing'. We suggest it should form the first clause of the objective.

Strategic Objective 5 e. 'Working in partnership to improving the health and wellbeing of Merton residents and workforce, deliver health facilities and promote healthy lifestyles' may fit better under Strategic Objective 1 as it relates to both infrastructure and the wider determinants of health.

Strategic objective 1: Healthy places

To make Merton a healthier place for all

We will achieve this by:

a) Assessing the impact of development proposals on physical and mental health and wellbeing to maximise the positive impacts and minimise adverse impacts.

a. Promoting inclusive, sustainable, secure, safe and accessible environments in Merton especially in parts of the borough where there are inequalities and deprivation;

b. Providing a choice and mix of homes which are accessible, adaptable and sustainable, which apply high quality design standards to meet the needs of Merton's diverse communities;

c. Improving access to nature and leisure facilities including opportunities for sport, physical activities, play and relaxation;

d. Promoting road safety to encourage responsible behaviour by all users of the public highway, encouraging. *Encouraging active travel and Healthy Streets.*

(5 e moved) 'Working in partnership to improving the health and wellbeing of Merton residents and workforce, deliver health facilities and promote healthy lifestyles.'

Section 2 Health and Wellbeing

We welcome the policy requirement for HIAs and emphasise the importance of their use as early in the development process as possible. Reference is made to HIA guidance, which we couldn't find on the Council's website. If this has yet to be developed we would suggest referencing the HUDU tools in the local plan and would welcome further discussion as to HIA use.

Policy HW2.2 Delivery Healthy Places

The first line could be strengthened by amending to read **'The Council will *require* or *expect development proposals to*'**

While we support the strong emphasis on improving health and wellbeing and addressing inequalities there may be an opportunity to review the detail of the Strategic Objectives, Strategic Policies and Policies to ensure the wording is as robust as possible and appropriate for its purpose.

Clause b) iii refers to 'areas of high levels of deprivation and health inequalities'. It may help clarity to set out in the justification section (paragraph 2.2.1) how 'high' is defined, for instance, above the borough average or as identified in the Health and Wellbeing Strategy.

Merton's Places

The CCG is reviewing its estate strategy in the context of the South West London Health and Care Partnership's strategy and the NHS Long Term Plan. Given the scale of population growth and change, and transformation and integration ambitions of the Council and the CCG, we welcome ongoing opportunities to discuss site allocations and their potential to support modern, fit for purpose and affordable health facilities.

Colliers Wood

Site CW3 Colliers Wood Community Centre. We support the continued use of this resource to provide for the health and wellbeing of the local community. The CCG would welcome discussion with the Council regarding the use of this site, and alternative sites in accessible locations, (for example CW4 Colliers Wood Station) given the potential requirement for additional health facilities in the locality.

Mitcham

Site Mi2 Birches Close and Site Mi18 Wilson Hospital: We note that NHS Property Services has responded in relation to these site allocations.

Morden

The inclusion of the last bullet on the first page of Policy N3.3 Morden "provide better services and facilities for the people who live, work or study in or pass through Morden" is welcome. Morden is one of the key growth areas within the borough with the Council

seeking Opportunity Area status for the area within the London Plan. The anticipated scale of population and housing growth will require additional health infrastructure. In addition to the proposed 2,000 homes within the regeneration area, new facilities could serve the anticipated growth in the wider town centre and locality.

The CCG looks forward to exploring with the Council the opportunity for affordable new health facilities within Morden Regeneration Area (Site Mo4).

Morden Road Clinic and Morden Hall Medical Centre (Site Mo5)

Paragraph 2.3.61. identifies there may be an opportunity to relocate the Morden Road Clinic and Morden Hall Medical Centre (Site Mo5) elsewhere within Morden to provide a modern, fit for purpose facility that meets the needs of the future population.

We support the Council's proposed site allocation for this site for a healthcare (D1 Use Class) led mixed-use scheme including residential or solely residential if an NHS primary healthcare facility is provided within Morden Town Centre.

Raynes Park

Site RP1 Amity Grove Clinic

We proposed this site for residential use on the basis that the health facility has already been re-provided within the local area. On this basis we request that the Council's proposed site allocation is amended to residential C3 use reflecting the current position.

Section 4 Housing

Strategic Policy LP H4.1

The table at the end of this policy sets out a 50% affordable housing target for public sector land. We would note that the NHS as a whole relies on the receipts from disposal of sites to enable other sites to be brought up to modern standards or to re-provide facilities on more accessible and suitable sites meeting. Other NHS bodies have responded to the Mayor's draft housing policies and the requirement for affordable housing based on the impact on the NHS to provide infrastructure.

Chapter 5 Design

There is no specific reference to health within the policies in this section although the justification section refers to its importance. The NHS London CCGs and HUDU have made representations to the Mayor's draft plan including objecting to the omission of health and wellbeing consideration within the housing and design chapters.

There is no mention of the importance of noise, and its minimisation through design within developments and the public realm. This can help encourage walking and the use of spaces with evidence that high noise levels have a significant adverse impact on health (particularly mental health) and wellbeing. The provision of adequate seating

should be encouraged and not lost through the desire to reduce street clutter, and urban greening encouraged.

Policy LP D5.1 refers to 'our sense of wellbeing and safety'. While our 'sense' of wellbeing is important we suggest the wording is amended to be more inclusive reflecting that place-making and design is important to physical and mental health and wellbeing and not just our sense of wellbeing. This principle applies also to our sense of safety and designing out crime.

Section 6 Infrastructure

We welcome the high priority the plan places on the provision of social and community infrastructure. While the growth in the borough's population will be a key factor in the demand for social infrastructure, the changing profile of the population is also important. An ageing population and increase in long term and complex health conditions places additional demands on health and social care and has implications for the accessibility of services and importance of preventing social isolation.

Policy T6.8 in the Transport section refers to the use of S106 obligations and planning conditions to secure the necessary infrastructure to support developments and we suggest similar wording is incorporated within the policies in this chapter.

Strategic Policy In6.1

Social and community infrastructure

Merton Council places high priority on the provision of social and community infrastructure, which is essential to support the projected population growth of the borough. Such facilities can be the heart of local communities and they are important for the quality of life of our residents.

We will:

- a. Ensure there is adequate provision of facilities for community and social infrastructure that are important for the quality of life of residents and which support the growing **and changing** population, by protecting existing and, where required, securing new facilities and services that meet people's needs;
- b. Support the principles of developing the Wilson Hospital in Mitcham and support the provision of new or improved healthcare facilities in the borough, in accordance with Merton's Clinical Commissioning Group (CCG) and NHS England requirements to meet the needs to Merton's projected population growth, especially in areas of regeneration or areas of deficiency;
- c. Require new development to provide for any necessary infrastructure **through S106 obligations or planning conditions where appropriate;**
- d. Work with partners to deliver adequate provision of services and facilities to match the projected population growth **and changing needs;**

- e. Expect development proposals to identify, plan for and, where necessary, complete infrastructure prior to occupation;
- f. Support the aims to improve access to primary care facilities, which could extend GP surgery hours and support the re-use of social infrastructure and the relocation of services wherever possible;

Delivery and Monitoring

There is no information as to how the Council will monitor the effectiveness of the policies and the delivery of the plan as a whole. We suggest there should be clear performance indicators reflecting the strategic objectives and policies. This should include measurable indicators to monitor the strategic objective and policies seeking to improve and reduce health inequalities.

Yours sincerely,



James Blythe
Managing Director
Merton & Wandsworth CCGs