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Dear Sir / Madam,

Merton New Local Plan: Stage 2a: 13 November 2020 – 1 February 2021

Thank you for the opportunity to comment on the above document. These representations are made by NHS Property Services (NHSPS) to the London Borough of Merton (“the Council”) in respect of their New Local Plan Stage 2a Consultation. They follow on from representations made by NHSPS on:

Stage 1: October 2017 – January 2018

Stage 2: October 2018 – January 2019

We ask that this response be read in conjunction with those comments previously made on Stage 1 and Stage 2.

Foreword

NHSPS manages, maintains, and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, and modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

A key part of NHSPS’ role relates to the provision of new healthcare facilities with the goal of ensuring that the healthcare needs of communities can be met. NHSPS works with commissioners, care providers and local councils to identify and respond to local healthcare and property needs. As such, it is involved in the acquisition and development of new facilities, and the redevelopment of existing facilities. Furthermore, NHSPS is required to dispose of land and property assets or facilities that have been identified as surplus to NHS requirements by Commissioners. This has resulted in the sale of 441 surplus properties, generated £381 million of sales receipts for the public purse and contributed to land sales supporting 6,607 housing units since April 2013.

It should be stated that NHSPS is actively working with our customers in response to the coronavirus (COVID-19) pandemic and are currently assessing vacant or underused space across our portfolio that could be repurposed for the provision of clinical beds and vaccination centres.

However, in the interests of supporting the NHS in the longer term, we are keen to continue 'business as usual' activity where possible. We are supporting our customers in the management of their buildings and wider portfolios, to ensure the most efficient and effective use of NHS space and engaging with Government to ensure that issues around health are prioritised.

Background

NHSPS is the freehold landowner of a number of health facilities in Merton. Detailed representations have previously been made in support of site allocations at the Wilson Hospital and Birches Clinic, along with Amity Grove Clinic.

- Mitcham Site Allocation Mi18 – The Wilson
- Mitcham Site Allocation Mi2 – Birches Close
- Raynes Park Site Allocation RP1 – Amity Grove

Our representations review these site allocations in turn, taking account of comments previously made, current commissioning strategies and proposed land use allocations.

Mitcham

Site Allocation Mi18 – The Wilson

The Wilson Hospital is located at Cranmer Road and measures 1.81 hectares, containing a collection of permanent and temporary buildings with a total floorspace of 5,480 sq m.

In accordance with representations previously submitted by NHSPS, dated January 2018 and January 2019, the clinical and planning strategy is for a health and wellbeing campus to be developed on the Wilson Site, alongside residential development on any land not required for this new facility.

The Wilson Site has a draft allocation under reference Mi18. The principle of the allocation for the site is supported by the NHSPS.

The draft Stage 2 allocation, set out the potential use of the site, issues and opportunities. This Stage 2a consultation establishes 'Design and accessibility guidance' to assist in the proper planning of a mixed-use healthcare / residential development.

NHSPS would also re-emphasise that whilst the draft allocation does not go so far as to detail the specific residential use, flexibility is sought with regards to the residential use, to allow for changes in market

demand. The promoted use is therefore healthcare and residential uses, including C3 and C2 uses. It is considered that both C2 and C3 uses would be appropriate and would meet a demand / need. More generally, the allocation should provide flexibility for the services to be re-provided elsewhere and the site be used for residential use only. Any relocation would involve improving services, potentially co-located/integrated with other uses and in a more accessible location.

Further, on 21st July the Government published new statutory instruments which amend both The Town and Country Planning (General Permitted Development) (England) Order 2015 and The Town and Country Planning (Use Classes) Order 1987 (“the Use Classes Order”). These changes came into effect on the 31 August and 1 September 2020.

The amendments have resulted in the deletion of Use Classes A1, A2, A3, A4, A5, B1, D1 and D2. Three new use classes (E, F1 and F2) will primarily accommodate these uses, with the remainder falling into the Sui Generis use class.

The creation of Class E (Commercial, business and service) incorporates uses such as health centres, gyms and nurseries (previously in use classes D1 Non-residential institutions and D2 Assembly and Leisure) and other uses that are suitable for a town centre are also included in the new use Class E. This is of relevance for the Wilson Hospital site, as the existing use now falls as within Class E, where previously it was D1.

Design and accessibility guidance

Our previous representations set out our understanding of the existing development constraints on site. The draft allocation includes a summary of these, and we continue to recognise them as part of the design development for the Site.

Our evolving plans are intended to revitalise the site and provide a more attractive, healthy and welcoming environment. We would however stress that a key component of a successful health and wellbeing campus will be maximising the residential development potential of the site. A pragmatic balance must therefore be struck between the constraints and opportunities offered by this site, with improved health services for the local community contingent on a viable amount and type of residential development being secured. A thorough assessment of these constraints will form part of any future planning application process.

Our proposed amendments to site allocation Mi18 are set out below:

Site allocation: Healthcare with community and enabling residential development, *or residential if the existing services are relocated within an alternative healthcare facility in the wider Mitcham area.*

The first paragraph under design and accessibility guidance should be deleted:

~~Development of the site an opportunity to provide a health centre and a community health hub in a neighbourhood with health inequalities and poor health~~

Site Allocation Mi2 – Birches Close

The Birches (“the Site”) is located at Birches Close, Mitcham. The Site measures 0.969 hectares and comprises a cul-de-sac with eight buildings of varying size arranged off Birches Close. This Site is in Mitcham Cricket Green Conservation Area. As with The Wilson, the Birches is owned by NHSPS.

The Site is poorly utilised, with an inefficient layout. A number of buildings onsite have suffered from dilapidation and would require significant investment to modernise them. The current strategy is to consolidate the services onto the Wilson Site, which will result in the Birches being surplus to operational requirements.

The Birches has a draft allocation under Mi2. The principle of the allocation of the site continues to be supported by NHSPS, and this aligns with NHSPS’s wider estate strategy. However, we continue to oppose the suggested trigger point for the development of the Birches Site.

It is understood that the Council require comfort that the long-term health needs of the local community can be met, however, it is clear that this need can be fully met and accommodated on the Wilson Hospital site. Under this proposed policy, the Birches Site would lie dormant, with no development coming forward for a considerable period while the more complex Wilson site is developed then opened.

Both the Wilson and Birches are individual development sites for planning purposes with their own specific site constraints. Purposefully delaying NHS consolidation strategies would neither assist the NHS with their strategic objectives, nor the Councils need to deliver housing. Furthermore, significant costs are incurred when holding and securing sites, often to deter antisocial behaviour and vandalism, something the Council will want to void. There is also a risk that any planning permission secured on the Birches site would lapse as construction is completed on the Wilson. This would not be in either the interest of the Council or the NHS and could result in wasted public funds and time.

We would therefore suggest that the trigger point is removed or amended to ensure the allocation is positively prepared.

Our proposed amendments to site allocation Mi2 are set out below:

Site allocation: Residential, following *the relocation of existing services in line with the Merton Health and Care Together Plan* the completion and opening of a primary healthcare facility that will be provided at the Wilson Hospital site as part of the health and wellbeing campus. To ensure that primary healthcare provision is delivered in this area and that there is no loss of potential NHS sites until this happens, the new primary healthcare facility must be built and operational before redevelopment can progress on the Birches site. Site allocated in Merton's Sites and Policies Plan 2014 as Site Proposal 21.

The first paragraph under the design and accessibility guidance should be deleted.

Design and accessibility guidance: ~~To ensure that primary healthcare provision is delivered in this area and that there is no loss of potential NHS sites until this happens, the new healthcare facility must be progressed before redevelopment can progress on the Birches site.~~

This would ensure that the allocation is consistent with the NPPF presumption in favour of sustainable development, which states that plans should be sufficiently flexible to adapt to rapid change.

As with Wilson, we continue to work up suitable plans for the Birches in the context of all relevant planning considerations. Earlier remarks regarding Class E - Commercial, Business and Service also apply to the Birches.

Site Allocation Mi12 - Sibthorpe Road Car Park

This allocation refers to town centre type uses. To achieve flexibility, the allocation should also refer to community and health uses which can also contribute to the town centre's viability and vitality. (PPG Paragraph: 001 Reference ID: 2b-001-20190722)

Our proposed amendments to site allocation Mi12 are set out below:

Site allocation: Town centre type uses retail, food and drink, professional services, *community and health uses* and residential on upper floors.

Notwithstanding this, it is acknowledged that **Use Class E - Commercial, Business and Service includes** for the provision of medical or health services, which may be captured by 'town centre type uses'.

Raynes Park

Site Allocation RP1 – Amity Grove

This site is surplus to NHS requirements and the services which previously operated from the Clinic have been dispersed. The site allocation refers to the existing use as 'medical clinic'. This should be amended to 'vacant former health clinic', as the site has not been used for health services for many years, with the

various services having relocated to the Nelson Health Centre (SW20 8DA). The site allocation currently reads “Community use (Clinics, health centres, crèches, day nurseries, day centre) or residential if the community service is provided elsewhere”. Given the health services have re-located we suggest the allocation is amended to read “Residential use”.

A residential allocation will make the best use of a surplus public sector site and allow for reinvestment in essential health services for the community.

Morden

Site Allocation Mo4 Morden Regeneration Zone

NHSPS support Mo4 and welcome the inclusion of a health facility as a policy requirement given the level of housing and population growth in the Regeneration Zone and the wider area. The NHS must receive an equitable share of developer contributions and or Community Infrastructure Levy funds in the Zone. This will be required to contribute to the cost mitigating the impacts of population growth in the Morden Regeneration Zone.

We also support the allocation for Site Mo5 Morden Road Clinic and Morden Hall Medical Centre, Morden Road SW19 3DA.

Policy IN16.2 Social and Community Infrastructure

NHSPS support the Councils recognition of the risk posed to existing healthcare facilities as part of Government changes to the Use Classes Order and the introduction of Class E (Commercial, Business and Service).

However, NHSPS does not support the application of parts b. i. and ii. of draft Policy IN16.2 when assessing any proposals involving the loss of NHS owned healthcare facilities.

NHS organisations are well-regulated outside of the planning regime and there is significant oversight by parties such as CCGs, NHS England and NHS Improvement who take a ‘forward view’ on healthcare planning needs. This involves significant amounts of consultation with stakeholders in relation to any service changes that they propose. Such oversight and consultation ensure that, in relation to healthcare premises, service reconfiguration is undertaken on a sound basis that does not prejudice service delivery for the foreseeable future.

NHSPS would therefore request the insertion of the below text as a separate limb of the policy, taken from part F 2 of Policy S1 Developing London's social infrastructure of the New London Plan:

IN16.2 b iii

Or the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.

Part of this assessment would involve engagement with the relevant stakeholders that are involved in providing services on site, or that rely on the provision of services on site. This inclusion will ensure policy IN16.2 is both consistent with the London Plan and guarantee NHS agreement prior to the disposal of existing healthcare facilities. Moreover, it will allow for the continued investment in new and improved health services in line with NHS transformation plans .

Housing land supply

It is recognised that the Intend to Publish London Plan, increases the Council's target to 9,180 homes over ten years, averaged at 918 homes per year, which is a 223% increase over the current target. 2,610 homes, of the 918 homes per year Intend to Publish London Plan target are expected to come forward on Small Sites. NHSPS looks forward to working closely with the Council to help secure this increased requirement.

Closing

NHSPS have worked collaboratively with the Local Planning Authority with regards to the delivery of intentions of the CCG, across both the Wilson Hospital Site, the Birches and Amity Grove.

We trust these representations are informative at this stage of the new Local Plan preparation and will be taken into consideration. Should you require any clarification on the issues raised in these representations, please do not hesitate to contact myself.

Yours sincerely,

Will Everson NHS Property Services