



NHS London Healthy Urban Development Unit

Tara Butler
Future Merton Team
London Borough of Merton
London Road
Morden SM4 5DX

6th September 2021

Dear Tara,

Response to Merton's Local Plan Stage 3 Consultation

This representation forms the formal response prepared by the NHS London Healthy Urban Development Unit on behalf of South West London Clinical Commissioning Group and emerging Integrated Care System to Stage 3 of the Local Plan consultation.

The Council's continuing commitment to improving the health and wellbeing of the community and the recognition of the contribution the planning process can make is welcomed.

We are pleased to see the inclusion of many of our proposed changes to the Stage 2a document incorporated within the Stage 3 document.

Where possible comments are set out under the relevant chapter/section for ease of reference. Red italics are used where specific changes to policies are proposed to ensure the Local Plan is sound and delivers the vision set out in the plan or to improve clarity, ease of use or accuracy.

We have worked with NHS PS in responding to the three site allocations within their ownership and support their response.

Chapter 01B Good Growth Strategy

There appears to be an inconsistency in the wording regarding the provision of social and community infrastructure, in relation to the 'places'. We ask that this is consistent or that the reason for the differences is clear if retained.

Wimbledon – there is no reference to social and community uses and unclear if this is an omission.

Colliers Wood

Reduce inequalities in the neighbourhood (health, income and social) and improve the wider determinates of health - providing a mix of uses, including substantial new homes (including affordable), employment and *social and* community uses.

Morden

Reduce inequalities in the neighbourhood (health, income and social) and improve the wider determinates of health by delivering a mix of uses, including affordable homes, offices and other employment opportunities, social *and* community facilities and retail to support new homes.

Mitcham

Reduce inequalities in the neighbourhood (health, income and social) and improve the wider determinates of health - providing a mix of uses, including substantial new homes (including affordable), employment, *social* and community uses.

The following paragraph appears under the different 'places' within the chapter. We suggest amendments for clarity and ease of reading of the third bullet point

- Maintain and create new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - o improve air quality and help tackle climate change.
 - o improve ~~the~~ health (including mental health) and wellbeing. *Or improve the health (including mental health) and wellbeing of the community*
 - o Mitigate flooding from all sources.

Chapter 3 Urban Development Objectives

Strategic Objective 3: places for people

It is important that adequate social infrastructure including health facilities is delivered to support new homes and also the increase in the population through increased density of occupation.

Clause e. refers to assessing the impact of major development. 'Assessing' will not necessarily result in maximising positive impacts and minimising adverse impacts, and the Council's objectives as it is only one step in the process. Therefore, we propose the following amendment:

e. ~~Assessing the impact of~~ *Requiring* major development proposals *to maximise the positive impacts and minimise adverse impacts* on physical and mental health and wellbeing ~~to maximise the positive impacts and minimise adverse impacts.~~

The justification can explain that assessment of proposals is an important part of the process and refer to the London Plan's Strategic Objective 'Creating a Healthy City' and to the NHS HUDU HIA Toolkit.

Spatial Vision

We suggest that bullet point 4 is amended to not only reflect a reduction in health and income inequality but also to increase overall health and wellbeing. Reducing inequalities does not necessarily mean an improvement in health and wellbeing for the most disadvantaged or the 'average' resident.

- *Improved community health and wellbeing and reduced health and income inequality within the borough and the disparities between the east and west of the borough.*

Neighbourhoods and Site Allocations

Site Allocations

Under Infrastructure Requirements the sentence "Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan." is included within some of the site allocations but not all.

However, the intent of this sentence is unclear. By 'have regard to' is it meant that development proposals will be expected to contribute to relevant identified infrastructure set out in Merton's IDP? If this is the case which the SELCCG supports then it should be reworded for clarity and to ensure that adequate infrastructure is provided alongside the new population as required by the NPPF and for the plan is sound. The proposed revised wording set out below should be included in all site allocations for consistency as each will create additional demand on infrastructure.

"Development proposals for this site must *contribute to creating additional capacity required as set out in* Merton's Infrastructure Delivery Plan."

Site Mi2 Birches Close, Mitcham, CR4 4LA

We support the principle of this site allocation and the response of NHS PS as the site owners

Infrastructure requirements

To ensure that *adequate* healthcare provision is delivered in this area *clinical capacity must be maintained through relocation/reprovision when and where needed as identified by SWLCCG/ICS* and that there is no loss of potential NHS sites until this happens, ~~the new Mitcham healthcare facility must be built and operational before redevelopment can progress on either the Wilson Hospital or Birches Close sites.~~

Site Allocation Mi18 – The Wilson

We support the principle of this site allocation and the response of NHS PS as the site owners.

Design and accessibility guidance

~~Residential, following the relocation of existing services, completion and opening of a healthcare facility in the Mitcham area.~~

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.

Development of the site is an opportunity to either provide a health centre/community health centre in a neighbourhood with health inequalities/ poor health *and/or* to provide new homes in an area of housing need. ~~(if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham).~~

Infrastructure Requirements

However, under infrastructure requirements we propose the text is amended as follows;

To ensure that *adequate* healthcare provision is delivered in this area *clinical capacity must be maintained through relocation/reprovision when and where needed as identified by SWLCCG/ICS* and that there is no loss of potential NHS sites capacity until this happens, the new Mitcham healthcare facility must be built and operational before redevelopment can progress on either the Wilson Hospital. ~~site or Birches Close sites =~~

Morden

The CCG has advised the Council that the growth projected for Morden Town Centre will require additional health infrastructure and this should be included in the text within the Growth and Neighbourhoods chapters. Reference is made in para 3.3.47 regarding the potential of Morden Road Clinic (Mo5) to be relocated. However, there is no reference to increased capacity to meet the needs of the population growth in site allocations. The relocation of the facilities on M05 should be part of a programme of expanded capacity. If this facility is not relocated with additional capacity, then this increase will need to be provided elsewhere within the town centre.

Site Mo4 Morden Regeneration Zone

This allocation omits a section regarding 'infrastructure requirements'. This should be rectified to ensure adequate infrastructure and include *" the provision of additional health infrastructure to meet the needs of the increased population in the area, either as part of the relocation of Morden Road Clinic and Morden Hall Medical Centre or through the provision of new infrastructure"*.

Mo5 Morden Road Clinic and Morden Hall Medical Centre Morden Road, Morden, SW19 3DA

We support this site allocation in principle however clinical capacity needs to be maintained for residents during redevelopment and increased capacity provided through the wider regeneration of the town centre. This should be reflected in the wording of the allocation.

SITE RP1: Amity Grove Clinic, Amity Grove, Raynes Park, SW20 0LQ.

Amity Grove is no longer owned by NHS PS and therefore the site ownership should be amended for accuracy.

Chapter 10 Health and Wellbeing

Strategic policy HW10.1 Health (including mental health) and Wellbeing

While we support this policy we are concerned that it omits reference to ‘improving health and wellbeing’ which should be incorporated alongside “reducing health and wellbeing”, in line with our earlier comments and to deliver the Council’s vision set out in the draft plan.

a. Working with strategic partners such as NHS (National Health Service) England, Clinical Commissioning Groups (CCG) and Merton’s Health and Wellbeing Boards in *improving health and wellbeing*, tackling health inequalities, public health safety (for example during pandemics and other health emergencies), promoting and encouraging healthy lifestyles and creating healthy environments in Merton for all.

We welcome the amendments made to Policy HW10.2: Delivering healthy places since Stage 2a.

Chapter 12 Places and Spaces

We suggest amendments to paragraph 12.3.18 for clarity as the last sentence is unclear. Additionally, the concern with difficulties caused by obstacles needs to be considered not just in refuse collection and recycling but through development, and road works/repairs and this should be reflected elsewhere in the plan for consistency and through the use of conditions when granting planning permission.

12.3.18. With the on-going push to increase recycling rates and minimise the amount of household waste going to landfill sites, bi-weekly collection of bins and a variety of other bins, bags and boxes for recycling present households with a number of problems in accommodating these requirements. These including providing sufficient off-street storage and that bins are accessible and do not obstruct footways, especially for people with *health difficulties, including mobility, sensory and mental health* ~~mobility or mental health problems~~ that make it difficult to navigate obstacles, *and blocking* accesses or carriageways on collection *days will cause major problems*.

We look forward to continuing collaboration with the Council in delivering the vision for the Borough, for improving the health and wellbeing of residents and reducing health

inequalities. The SWLCCG and NHS partners are updating their estate strategy to reflect the NHS's response to Covid-19 as well as implementing the NHS Long Term Plan. We will share this with the Council to update the July 2021 version of the Infrastructure Delivery Plan.

Please do not hesitate to contact me should you have any queries regarding any of the points raised in this response.

Your sincerely,

Mary Manuel

Mary Manuel
Head of the NHS Healthy Urban Development Unit