



**Property
Services**

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Dear Sir / Madam,

Merton New Local Plan: Stage 3: 22 July 2021 – 6 September 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 3 Consultation. They follow on from representations made by NHSPS on:

Stage 1: October 2017 – January 2018

Stage 2: October 2018 – January 2019

Stage 2a: 13 November 2020 – 1 February 2021

We ask that this response be read in conjunction with those comments previously made on Stage 1, Stage 2 and Stage 2a. Comments on this Stage 3 consultation are focused on land and property owned by NHSPS and policies which may affect future development proposals.

We have also worked with the Healthy Urban Development Unit (HUDU) in respect of our representation and support their submission.

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 NHS 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.

Background

NHSPS is the freehold landowner of health facilities in Merton and detailed representations have previously been made in support of draft site allocations on NHSPS sites. These Stage 3 representations review the site allocations, where they remain relevant, 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, January 2019 and February 2021, the clinical and planning strategy is for a health 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. The Stage 2a consultation established 'Design and accesbilty guidance' to assist in the proper planning of a mixed-use healthcare / residential development. This Stage 3 consultation modifies some of the allocation wording and includes an additional section on Infrastructure Requirements.

Our previous representations set out our understanding of the existing development constraints on site. The draft allocation includes a summary of these, and we will continue to recognise them as part of future design and development of 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 funding new health care facilities will be maximising the residential development potential of the site and the recycling of capital released into the new health care facility. 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. Suggested deletions are shown as a ~~strike through~~ and additions in *red italics*.

Allocation Wording	Amendment	Justification
Ward	N/A	N/A
Site description	N/A	N/A
Site owner	National Health Service (NHS) <i>NHS Property Services (NHSPS)</i>	NHSPS is the freehold landowner of the Wilson Hospital Site.
Site area	N/A	N/A
Existing uses	N/A	N/A
Site allocation	N/A	NHSPS support the addition of 'or residential if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham.' This will ensure the allocation is sufficiently flexible to support healthcare commissioning needs in the area.
Site deliverability	5 – 10 years <i>0 – 5 Years</i>	Potential to deliver within 5-year period
Indicative site capacity (new homes)	N/A	NHSPS support this inclusion. Residential site capacity will be determined through design progression and dependent on the location and amount of healthcare floorspace required on site.
Design and accessibility guidance	Residential, following the relocation of existing services, completion and opening of a healthcare facility in the Mitcham area. <i>Healthcare with community and enabling residential development, or</i>	The Design and accessibility guidance as worded reads as though the site is not capable of delivering a mix of healthcare and residential uses and is therefore inconsistent with the 'Site allocation' wording, which allows for this mix.

	<p><i>residential if the existing services are relocated within an alternative healthcare facility.</i></p> <p>Development of the site is an opportunity to either provide a health centre/community health centre in a neighbourhood with health inequalities/poor health <i>and/or</i> to provide new homes in an area of housing needs (if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham).</p>	<p>Amendments have been suggested for consistency and clarity.</p>
<p>Infrastructure Requirements:</p>	<p>To ensure that <i>adequate</i> healthcare provision is delivered in this area <i>clinical capacity must be maintained through relocation/reprovision when and where needed as identified by SWLCCG/ICS</i> 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</p>	<p>The Site allocation wording recognises that residential development on the Wilson site will ‘enable’ the delivery of the new health facility. Seeking to control phasing of certain uses on the Wilson site could undermine the purpose of enabling residential development and delivery of vital health services for the community.</p> <p>To confirm, NHSPS property or land can only be released for disposal for alternative/non health care use once Commissioners have confirmed that the land is no longer required for the delivery of NHS services.</p> <p>The Council will therefore receive comfort that the health requirements of residents will be met as the site progresses through any pre-application meetings and rounds of public engagement. NHSPS believe that this</p>

		<p>progression can be achieved through proactive engagement rather than a physical start on site.</p> <p>Moreover, NHSPS believe that the draft Policy IN14.2, which now recognises ‘wider public service transformation plans’ when considering the reorganisation of health facilities is sufficiently robust to manage redevelopment proposals on the Wilson site.</p>
The site location	N/A	N/A

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 Birches has a draft allocation under Mi2. The principle of the allocation of the site continues to be supported by NHSPS. However, we remain opposed to the suggested trigger that a new Mitcham healthcare facility must be built and operational before any redevelopment can progress on the Birches Close site.

It is understood that the Council require comfort that the long-term health needs of the local community can be met. As with The Wilson, NHSPS cannot dispose of land or buildings until declared surplus by NHS Commissioners following a robust assessment of local health care needs.

Under this proposed allocation, the Birches Site could 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. Delaying NHS consolidation strategies would neither assist the NHS with their strategic objectives, nor the Councils need to deliver housing and would be incompatible with draft Policy IN16.2. Furthermore, significant costs are incurred when holding and securing sites, often to deter antisocial behaviour and vandalism, something the Council will want to avoid. 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. Suggested deletions are shown as a ~~strike through~~ and additions in *red italics*.

Allocation Wording	Amendment	Justification
Ward	N/A	N/A
Site description	N/A	N/A
Site owner	<i>NHS Property Services (NHSPS)</i>	Insert for consistency.
Site area	N/A	N/A
Existing uses	N/A	N/A
Site allocation	N/A	NHSPS support the proposed Site allocation wording.
Site deliverability	5 – 10 years <i>0 – 5 Years</i>	Potential to deliver within 5-year period
Indicative site capacity (new homes)	N/A	NHSPS support indicative capacity.
Design and accessibility guidance	N/A	
Infrastructure Requirements:	To ensure that <i>adequate</i> healthcare provision is delivered in this area <i>clinical capacity must be maintained through</i>	NHSPS believe draft Policy IN14.2 is sufficiently robust to manage any future

	<p><i>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.</i></p>	<p>development for an alternative use on the Birches site. To satisfy this, the Council will be in receipt of a Community Needs Statement and justification that any proposals form part of a wider public service transformation plan.</p> <p>It is unclear why additional control is sought in respect of both the Wilson and Birches sites, given the criteria for a Community Needs Statement set out in draft para 14.2.15 does not require a new facility to be ‘built and operational’ prior to the redevelopment of an existing one.</p> <p>In the spirit of the recently updated London Plan (2021), Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to identify opportunities to make better use of existing infrastructure and facilitate the release of surplus buildings and land for other uses.</p> <p>Indeed, National Planning Policy (NPPF paragraph 60) is clear that:</p> <p><i>“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed <u>and that land with permission is developed</u></i></p>
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		<p><i>without unnecessary delay.” (Our emphasis)</i></p> <p>If an arbitrary restriction is placed on the redevelopment of the site, it cannot be said that the that land with permission is developed without unnecessary delay. Thus, the site allocation as currently drafted would not be consistent with national, regional or draft local policy.</p>
The site location	N/A	N/A

Morden

NHSPS support site Mo4 and welcome the recognition that a health services must be considered 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, subject to the commissioning needs and requirements of SWLCCG/ICS.

Raynes Park

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

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

Chapter 14 Infrastructure

Policy IN16.2 Social and Community Infrastructure

In our response to Stage 2a, we recommended the inclusion of wording to allow public service transformation plans to be taken into account when assessing the loss of vacant health buildings. This inclusion would ensure draft Policy IN14.2 would be consistent with part F 2 of Policy S1 Developing London’s social infrastructure of the New London Plan

NHSPS note and support the inclusion of the wording 'unless it forms part of a wider public service transformation plan' in Part b.ii, which will ensure the NHS is not subject to onerous marketing periods which delay vital investment in new and improved health services and facilities.

NHSPS support HUDUs comments on Chapter 10 Health and Wellbeing and Chapter 12 Places and Spaces.

Closing

NHSPS will work collaboratively with the Local Planning Authority with regards to the delivery of intentions for the CCG, across both the Wilson Hospital Site and the Birches.

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