

**From:**  
**To:** [Future Merton](#)  
**Subject:** NHSPS Response - Main Modifications Consultation - Merton's Draft Local Plan  
**Date:** 22 March 2024 17:05:07  
**Attachments:** [NHSPS Response - Merton Local Plan Main Mods.pdf](#)

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Good Afternoon,

Please find enclosed a representation submitted on behalf of NHS Property Services (NHSPS) in relation to the Main Mods Consultation on Merton's Draft Local Plan.

I would be grateful if you could confirm receipt of the attached.

Should you have any queries or require any further information on the enclosed, please do not hesitate to contact me. We would be grateful to be kept informed of the progression of the Local Plan via our dedicated email address - [town.planning@property.nhs.uk](mailto:town.planning@property.nhs.uk).

Kind regards,

**NHS Property Services Ltd**  
10 South Colonnade, Canary Wharf, E14 4PU  
M: 07974 383624 | E: [ellen.moore@property.nhs.uk](mailto:ellen.moore@property.nhs.uk)

[www.property.nhs.uk](http://www.property.nhs.uk) | @NHSPProperty

**Customer Support Centre:** T: 0800 085 2013 | E: [customer.service@property.nhs.uk](mailto:customer.service@property.nhs.uk)

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FutureMerton,  
Merton Civic Centre  
London Road  
Morden  
SM4 5DX  
[future.merton@merton.gov.uk](mailto:future.merton@merton.gov.uk)

NHS Property Services Ltd  
10 South Colonnade  
Canary Wharf  
London E14 4PU  
[town.planning@property.nhs.uk](mailto:town.planning@property.nhs.uk)  
[www.property.nhs.uk](http://www.property.nhs.uk)

22 March 2024

BY EMAIL ONLY

## **RE: Consultation on Merton Draft Local Plan Post Hearings Main Modifications**

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS).

### **NHS Property Services**

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

NHSPS is the freehold landowner of several health facilities in Merton. NHSPS has engaged with the previous consultations on the Draft Local Plan, including making detailed representations on draft site allocations which relate to these facilities.

### **Detailed Comments on Main Modifications Draft Local Plan Policies**

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth.

#### **Site Allocation: Site Mi2: Birches Close, Mitcham, CR4 4LA**

The site is allocated for “healthcare with community and enabling residential development or residential if the existing services are relocated within an alternative healthcare facility in Mitcham”. The principle of the allocation of the site continues to be supported by NHSPS, and this aligns with NHS and NHSPS’s wider estate strategy. However, as raised in our previous consultation responses we continue to oppose the suggested trigger point for the development of the Birches site listed under Part 1 of the Infrastructure Requirements.

It is understood that the Council require comfort that the long-term health needs of the local community can be met. However, the NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area.

The Birches site is poorly utilised with an inefficient layout, and several buildings have suffered from dilapidation which would require significant investment of public funds to attempt to bring these up to modern standards, which is not considered to represent best value for the health estate. Therefore, works will be taken forward on the Wilson site. Capital receipt from the disposal of the Birches site is necessary to cross fund works at the Wilson site to ensure the long-term health needs of the local community can be met.

The proposed allocation as currently worded could give rise to a scenario where health services are relocated out of the Birches site to other facilities and the site would lie dormant, with no development coming forward for a considerable period on the site or at the Wilson site. To ensure the Local Plan is positively prepared and effective, NHSPS are seeking the following modification (*shown in italics*) to Part 1 of the Infrastructure Requirements listed in this site allocation to enable flexibility on this matter.

Proposed Modification to Policy Site Allocation: Site Mi2:

*Infrastructure requirements*

*1. To ensure that healthcare provision is delivered in this area 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, unless otherwise agreed between the Council and NHS/NHS Property Services.*

**Site Allocation: Site Mi18: Wilson Hospital Cranmer Road, Mitcham, CR4 4LD**

The site is allocated for “Healthcare with community and enabling residential development. or residential if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham”. As set out above capital receipt from the disposal of the Birches site is necessary to cross fund works at the Wilson to ensure the long-term health needs of the local community can be met. NHSPS therefore seeks the same modification as requested on the Birches site (*shown in italics*) to Part 1 of the Infrastructure Requirements listed in the site allocation for the Wilson site.

Proposed Modification to Policy Site Allocation: Site Mi18:

*Infrastructure requirements*

*1. To ensure that healthcare provision is delivered in this area 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, unless otherwise agreed between the Council and NHS/NHS Property Services.*

### **Draft Strategic Policy HW10.1: Health (including mental health) and Wellbeing**

The Main Modifications to the policy and supporting text are supported by NHSPS, in particular the acknowledgement of an integrated approach to health and wellbeing being necessary to address health inequalities, recognising the wide-ranging determinants that influence this.

### **Draft Policy HW10.2: Delivering Healthy Places**

The Main Modifications to the policy and supporting text are supported by NHSPS. We welcome the requirement in the supporting text for proposed developments within 800 metres of two or more other major developments planned or started to be required to carry out a HIA which considers the cumulative impact, where necessary. We would encourage the Council and applicants to agree the scope of any HIA at pre-application stage, and liaise with relevant NHS bodies to agree the most appropriate means of meeting the relevant healthcare needs arising from a new development as early as possible in the planning process.

### **Draft Strategic Policy H11.1: Housing Choice**

NHSPS supports the overall principle of this policy to enable delivery of affordable housing across the Borough. We recommend that as part of implementing policy the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:

- Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners including in the development of any supporting or supplementary guidance on the application of Strategic Policy H11.1.
- Ensure that the local need for affordable housing for NHS staff is factored into future housing needs assessments, and any other relevant evidence base studies that inform future reviews of the local plan (for example employment or other economic policies).
- Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.

### **Draft Strategic Policy IN14.1: Infrastructure**

NHSPS acknowledges the modification proposed to Part (a) is seeking to ensure the Plan is justified, effective and in general conformity with the London Plan, however we do not agree that the priority for infrastructure be limited to affordable housing and public transport. Part (a) is clear there is an expectation for "new development to identify, plan for and provide any necessary infrastructure" (our emphasis).

Where new developments create a demand for health services that cannot be supported by small incremental extension or internal modification of existing facilities, the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. To be effective, this Policy must require the provision of such appropriate infrastructure where the impact/demand is evidenced as being created by the new development. The appropriate infrastructure in relation to health may include financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these.

To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification (*shown in italics*) to Part (a) Draft Strategic Policy IN14.1.

Proposed Modification to Part (a) Draft Strategic Policy IN14.1:

*a. Expect new development to identify, plan for and provide any necessary Infrastructure and require that, where necessary, Infrastructure should be completed prior to occupation.*

*Require new development to comply with London Plan Policy DF1 (Delivery of the Plan and Planning Obligations) which, amongst other things sets out the approach to viability testing, decision making and infrastructure prioritisation (Parts B, C and D) that the Council will take where it has been demonstrated that planning obligations cannot viably be supported. On a site-specific basis this shall include consideration of the Council's published Viability Study, the Mayor's Affordable Housing and Viability SPG and, that priority be given to affordable housing and necessary public transport improvements **unless other infrastructure needs are demonstrated by technical assessments submitted with a planning application or infrastructure contributions are requested by statutory consultees or service providers. Where other infrastructure is demonstrated as needed or is requested, it should be prioritised with affordable housing or public transport.***

### Draft Policy IN14.2: Social and Community Infrastructure

The Main Modifications to the policy and supporting text are welcomed by NHSPS, and the overall wording of this policy is supported.

### Conclusion

NHSPS thank the London Borough of Merton for the opportunity to comment on the[Merton Draft Local Plan Post Hearings Main Modifications. We trust our comments will be taken into consideration. Should you have any queries or require any further information, please do not hesitate to contact me.

Yours faithfully,

**For and on behalf of NHS Property Services Ltd**