



## South West London

### Sutton and Merton Borough Team

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For the attention of Tara Butler, Spatial Policy Planning Manager,

22 March 2012

Dear Tara

NHS Sutton and Merton are pleased to submit our response to the public consultation on the Merton Sites and Policy Development Document submission. The PCT has worked with the spatial planning team over the last 5 years to shape the strategy and policies and is pleased that the draft is generally in accordance with the principles that inform the community plan.

However drafting such a document is complex and does not always state explicitly some of the issues that should be clarified. Thus the detailed comments in this document reflect the PCT's desire to demonstrate explicit links between health issues and strategies and planning strategy and guidance to developers.

In reviewing the document the PCT identified a number of areas where it is considered that further detailed work is going to be required. The PCT welcomes the opportunity to work with the council developing and revising the development policies.

The PCT assumes that its concerns and issues will be dealt with through ongoing meetings as well as an annual review and meetings with other infrastructure providers. The PCT anticipates that the meetings will ensure that the PCT and the borough reach agreement on these issues. However, I would note that at this time the PCT (or its successor) will wish to make representations at the Enquiry in Public (EIP).

Yours faithfully

**Adam Wickings**  
**Merton Borough Managing Director**

**Copy:** Andrew Grimes, Head of Estates Strategy, NHS Sutton & Merton

Chairman: Sian Bates Chief Executive: Ann Radmore

A partnership of local primary care trusts: Croydon, Kingston, Richmond, Sutton & Merton and Wandsworth

## London Borough of Merton

### Draft Sites and Policies Development DPD Draft Consultation – March 2012

#### Background

NHS Sutton and Merton is a statutory respondent to the Local Development Framework consultation process in the London Borough of Merton. Following the adoption of the Core Strategy in July, 2011 which covers development for the period 2011- 2026 the borough has issued the Draft Sites and Policies DPD for consultation. The Sutton and Merton PCT team has participated in the process since 2007 and considers the Core Strategy to be sound. The Sites and Policies DPD develops the themes of the Core Strategy into guidance for developers.

The Borough Commissioning and Public Health teams have prepared responses to the consultation which provided comments and clarifications, objections and support to the policies and proposals. These responses are presented in this report. The Clinical Commissioning (Delegated) Committee has recommended that the Merton Borough Managing Director submit the response to the London Borough of Merton.

#### Review

The policies and sites of requiring comments, clarifications, or objections are listed below. Appendix 1 lists all other policies and sites development proposals that are acknowledged and accepted. Appendix 2 contains a list of development sites and review of access to primary care. The review applied the following tests:

- |   |  |
|---|--|
| 1)  | Detailed policy: Does it support health objectives;            |
| 2)<br>acquisition/ disposal proposals;                      | Detailed policy: Does it support health estate development/    |
| 3)<br>acquisition/disposal proposals;                       | Development sites: Do plans support health estate development/ |
| 4)<br>provision requiring development of healthcare estate. | Development sites: Do plans create impact on healthcare        |

**Test 1: Detailed policy: Does it support health objectives;**

The PCT supports the policies below subject to the comments being adopted.

	Planning Policy	Issue	Response by	Response
1	DMR5	Food and drink/ leisure and entertainment: provision of pubs and takeaways.	Public health	Confirm support main option (f) and objection to alternative option 1.64 In addition to the 'over concentration' policy(para 1.76), we would like the Council to include a 'Saturation Point' policy aimed at reducing the prevalence and clustering of hot food takeaways especially in close proximity to schools, parks and youth amenities. This could link with work with local businesses under the local 'Public health responsibility deal'. Example attached from Barking and Dagenham.(Appendix 3)
2	DMR 7	Markets	Public Health	Confirm support – especially where markets contribute to increasing access to affordable healthy food
3	DMH1	Supported care housing and care homes	Public Health	Confirm support Public Health (PH) confirm support
4	DM H2	Housing mix	Public Health	Confirm support PH confirm support including sustainability objectives for social inclusion. Note there is no reference to density and access to outside space/green spaces – should this be referenced here?
5	DM C1	Community facilities	BHCH/Public Health	Support main option with caveat that the BHCH major development programme is

				not required to meet Policy bii. and para 3.6 which may impact on funding.
6	DMC2	None (Education)	Public Health	PH confirm support, query is there further guidance in relation to limiting/mitigating impact of schools development and expansion applications on parks and open spaces?
7	DMO1	Open space	Public Health	Confirm Support
8	DMD1	Design considerations in all developments	Public Health	Confirm support. PH Query is there any provision for prioritising planning proposals that maximise access to open space over and above the minimum requirements (e.g. para 6.4 on garden space)?
9	DMD4	Urban Design and Public Realm	Public Health	Confirm support subject to caveat: Policy a. should be strengthened to not just facilitate, but 'actively promote' walking, cycling and use of public transport. Para 6.37 should include the council having regard for relevant HUDU documents including 'Guidance on Delivering Healthy Communities in London, (2007)
10	DMD6	Telecommunications	Public Health	Confirm support
11	DMEP2	Noise	Public Health	Confirm support
12	DMT1	Sustainable transport and active Travel	Public Health	Add to end of policy aim '..and increase physical activity levels'.

**Test 2: Detailed policy: Does it support health estate development/ acquisition/ disposal proposals;**

The PCT supports the policies listed below subject to the comments being adopted:

	Planning Policy	Issue	Response by	Response
1	DM C1	Community facilities	BHCH/Public	Support main option with caveat that the

			Health	BHCH major development programme is not required to meet Policy bii. and para 3.6 which may impact on funding.
2	DM E1	None (Employment areas)	Borough MD	Support Add Healthcare is also employment use.
3	DM E2	Offices in town and local centre: Change of use of offices.	BHCH	Support alternative option for Healthcare use with 3 year marketing test. Note Healthcare is also an employment use.
19	DMD3	Heritage assets	BHCH	Support with caveat that conservation should not prevent modernisation of healthcare facilities.
5	DMEP1	Opportunities for decentralised energy networks	Carbon Manager	Support provided it does not place unnecessary costs on developments in anticipation of the networks being delivered.

### Test 3: Development sites: Do plans support health estate development/ acquisition/disposal proposals;

The following site proposals do not support health estate development/ acquisition/disposal proposals and the PCT requests the following changes:

Site		Comment/amendment
Site 07	Gifford House	Propose retention as offices for community based health teams
Site 08	Leyton Road Centre	Propose retention as offices for community based health teams
Site 19	Nelson Hospital	Propose, in accordance with the planning brief, that the hospital is designated D1 Health and Car Park as C2
Site 20	Wilson Hospital	Support C3 use to fund BHCH programme if the property in part or in whole becomes surplus to healthcare (D1) needs.
Site 21	Birches Close	Support D1 health use or with option for C2 or C3 to fund BHCH requirement if the property in part or in whole becomes surplus to healthcare (D1) requirements.
Site 53	Brook House, Cricket Green,	NHS Sutton and Merton prefer site to be available for D1 use aligned and as

	<b>Mitcham</b>	part of the redevelopment of Birches Close as a Local Care Centre

**Test 4 Development sites: Do plans create impact on healthcare provision requiring development of healthcare estate.**

There is continued lack of clarity over the scale of specific development sites which restricts the accuracy of the 4<sup>th</sup> test covering the impact of housing development on the need to develop new healthcare facilities. The Core Strategy Policy CS 9 states that the borough will:

“Work with housing providers to facilitate the provision of a minimum of 4,800 additional homes for the period 2011 - 2026 including the indicative ranges (rounded figures) for the sub-areas” shown in the table below:

	LB Merton data		NHS Sutton and Merton impact		
	Location	Housing units	Population impact	Impact on GP provision	NHS Sutton and Merton capacity
1	Morden	1450-1800	3451-4284	1.9-2.4 wte	Ravensbury Park – on stream Autumn 2012 Support for potential redevelopment of Morden Road Clinic to increase Primary Care capacity (site 24) after completion of Nelson LCC in 2014
2	Mitcham	1550-1850	3689-4403	2-2.4 wte	Ravensbury Park – on stream Autumn 2012 New premises on Rowans Estate will improve capacity in Mitcham/ Figges Marsh. The business case is awaiting approval. Planning consented.
3	Colliers Wood and South	500-600	1190-1426	0.67 -0.8 wte	New premises in Colliers Wood will solve many problems in that area. The business

	Wimbledon				case is awaiting approval. Planning consented.
4	Wimbledon	500-600	1190-1426	0.67 -0.8 wte	Development of Nelson LCC (site19) and transfer of Patrick Doody (site 22) to Primary Care after Nelson LCC completion in 2014. Possible use of site 62 for health <b>Site 30 Land adjacent Home Park Road, Wimbledon Park:</b> Small site but Vineyard Hill has minimal capacity – may require relocation/investment.
5	Raynes Park	500-600	1190-1426	0.67 -0.8 wte	Lambton Road – on stream Autumn 2012
	Total	4500-5400	10710-12971	6-7.2 wte	

Average household size of 2.38 per dwelling according to para 4.13 of Merton Core Strategy (2011)

Based on 1800 patients per GP (wte)

Where development sites are close to borders with Kingston, Wandsworth and Sutton the appropriate provision of GP capacity may be in the adjoining borough/PCT area as described below

Site		Comment
<b>Site 15</b>	<b>West Barnes Library</b>	Nearest GP is in West .Barnes Lane (KPCT practice)
<b>Site 18</b>	<b>Pitcairn Road, Mitcham</b>	Small site and close to South Tooting Medical Centre (WPCT) which should cope. Nearest SMPCT surgeries not very close.
<b>Site 36</b>	<b>Chaucer Centre, Morden</b>	Very near Faccini House which probably has capacity.(Sutton)
<b>Site 37</b>	<b>Wimbledon Greyhound Stadium</b>	If residential could be significant numbers. Nearest SMPCT surgeries are Naha in Garrett Lane and Vineyard Hill neither has capacity. Capacity will be Steerforth Street (WPCT) and Tooting Health Centre) in 2013.
<b>Site 48</b>	<b>Bushey Road, Raynes Park</b>	Close to PCT border. Kingston practice in West Barnes Lane and Lambton Road in Raynes Park, late 2012.

Andrew Grimes -15-03-2012



**Appendix 1:** Policies and sites proposals not requiring comments, clarifications or objections.

Table: Areas not requiring comment to be supported by the Borough MD

	Planning Policy	Issue	Response by	Response
	DMR1	None (Location of town centres)	Borough MD	Support
	DMR2	None (out of town commercial development)	Borough MD	Support main option
	DMR3	None (Protecting local shops)	Borough MD	Support main option
	DMR4	None (Protecting shops in shopping frontages)	Borough MD	Support main option
	DMR6	None (Culture, art & tourism)	Borough MD	Support
	DME3	None (Protection of scattered employment sites)	Borough MD	Support
	DME4	None (Local employment )	Borough MD	Support
	DMD2	None (Alterations and extensions to existing buildings)	Borough MD	Support
	DMD4	None (Urban design)	Borough MD	Support
	DMD5	None (Advertisements)	Borough MD	Support
	DMD7	None (Shop front design)	Borough MD	Support
	DMEP2	None (Reducing and mitigating noise).	Borough MD	Support
	DMF1	None(Support for flood risk management)	Borough MD	Support
	DMF2	None(Sustainable drainage systems)	Borough MD	Support
	DMT1	None( Support of sustainable transport and active travel)	Borough MD	Support
	DMT2	None (Consideration of transport impacts on development)	Borough MD	Support
	DMT3	None(Applying relevant car parking and servicing standards)	Borough MD	Support
	DMT4	None( Transport Infrastructure improvements)	Borough MD	Support

	DMT5	None( Consideration of connections and access to the road network)	Borough MD	Support
Proposals				
	A2	None ( Transport Proposals)	Borough MD	Support
	B	None ( Open spaces)	Borough MD	Support
	C	None (Natural environment)	Borough MD	Support
	G	None (Flood risk assessments)	Borough MD	Support
	H	None (saved UDP policies)	Borough MD	Support
Sites				
	02	43-45 Palestine Grove		No comment
	06	Durnsford Road Corner		No comment
	09	Mitcham Library		No comment
	10	Morden Assembly Hall		No comment
	12	Queens Road Car Park		No comment
	13	Land at Rose Avenue		No comment
	14	Taylor Road Day Centre		No comment
	15	West Barnes Library		Support proposal
	16	Wimbledon Library/ Marlborough Hall		Support proposal
	17	. 17 – Worsfold House / Chapel Orchard		Support LBM proposal
	18	18 – 60 Pitcairn Road		No comment
	27	Merton Hall		No comment
	28	“P4” Land Adjoining Wimbledon Theatre		No comment
	30	Land Adjacent 10 Home Park Road		No comment
	31	Wimbledon Community Centre		No comment
	33	Elm Nursery Car Park		No comment
	34	Raleigh Gardens Car Park		No comment
	35	Mitcham Fire Station		No comment
	37	Wimbledon Greyhound Stadium		No comment
	38	Thames Water Site		No comment
	41	Kingston Road Opposite Lower Downs		No comment
	46	The Old Lamp Works		No comment
	48	Land at Bushey Road		No comment
	49	Wimbledon Delivery Office		No comment

	50	7, 8 and 12 Waterside Way		No comment
	55	Field B St Catherine's Square West Barnes		No comment
	60	York Close Car Park		No comment
	61	Morden Station Car Park		No comment
	M	Grouped sites Morden		Support
	NM	Grouped sites North Mitcham		Support
Part 111 Maps				
	All	None ( Information only)		No comment

## Appendix 2

### GP Capacity response to development sites.

Site		Comment
Site 1	Hartfield Road Car Park	See Wimbledon grouped sites
Site 2	Palestine Grove, Colliers Wood	Current capacity in Mitcham Medical Centre, Haslemere Avenue. If Colliers Wood practice scheme proceeds, there will be further significant additional capacity within 2 years.
Site 3	n/a	
Site 4	Bond Road Day Nursery, Mitcham	Likely capacity at Miles Road. Also if move to new premises on the Rowan Estate goes ahead there will be further capacity. However approval not yet forthcoming.
Site 5	Colliers Wood Community Centre	This is very close to Colliers Wood main surgery in CW High Street. If their development, conversion of office block in CW High Street, goes ahead there should be significant extra capacity.
Site 6	Durnsford Rd Corner, Gap Road	Probably not residential
Site 7	Gifford House, St Helier Avenue	There will be increased capacity in the area when the new premises open later in 2012 in Ravensbury Park.
Site 8	Leyton Road Centre, Colliers Wood	This is between Merton Medical Practice and Colliers Wood practice. See comment at site 5.
Site 9	Mitcham Library, London Road	This is very close to Figges Marsh surgery (relatively modern) and reasonably close to potential premises on Rowan Estate so should be sufficient
Site 10	Morden Assembly Hall, Tudor Drive	Unlikely to be significant residential.
Site 11	n/a	
Site 12	Queens Road car park, Wimbledon	See Wimbledon grouped sites
Site 13	Rose Avenue, Mitcham	Very close to possible new premises and not far from Figges Marsh Medical Centre.
Site 14	Taylor Road Day Centre, Mitcham	Equidistant between new premises and South Tooting Medical Centre (WPCT)

<b>Site 15</b>	<b>West Barnes Library</b>	Nearest GP is in West Barnes Lane (KPCT practice)
<b>Site 16</b>	<b>Wimbledon Library</b>	Very small residential component likely
<b>Site 17</b>	<b>Worsfold House, Church Road, Mitcham</b>	Miles Road should be able to cope but we don't know size of residential
<b>Site 18</b>	<b>Pitcairn Road, Mitcham</b>	Small site and close to South Tooting Medical Centre (WPCT) which should cope. Nearest SMPCT surgeries not very close.
<b>Site 19</b>	<b>Nelson Hospital</b>	Residential dealt with by GPs in Nelson Development.
<b>Site 20</b>	<b>Wilson Hospital</b>	Residential development met by capacity at various surgeries in Mitcham
<b>Site 21</b>	<b>Birches Close</b>	Very close to Wilson. Figges Marsh HC not far.
<b>Site 22</b>	<b>Patrick Doody Clinic</b>	Potential to provide Primary Care during the plan period
<b>Site 23</b>	<b>Amity Grove Clinic</b>	Should be covered supported by new development at Lambton Road.
<b>Site 24</b>	<b>Morden Road Clinic</b>	See Morden grouped sites.
<b>Site 25</b>	n/a	
<b>Site 26</b>	n/a	
<b>Site 27</b>	<b>Merton Hall, Kingston Road, Wimbledon</b>	Presume Nelson deals with. In opposite direction Merton Medical practice probably has capacity.
<b>Site 28</b>	<b>Wimbledon Theatre Car park</b>	See Wimbledon grouped sites.
<b>Site 29</b>	n/a	
<b>Site 30</b>	<b>Land adjacent Home Park Road, Wimbledon Park</b>	Small site but Vineyard Hill has minimal capacity – should relocate.
<b>Site 31</b>	<b>Wimbledon Community Centre, St Georges Road, Wimbledon</b>	See Wimbledon grouped sites.
<b>Site 32</b>	<b>Wyvern Youth Centre, Arras Avenue, Morden</b>	New practice in Ravensbury Park should cope. Morden Hall nearest – see Morden grouped sites.
<b>Site 33</b>	<b>Elm Nursery car park, London Road, Mitcham</b>	Opposite Figges Marsh HC and not far from potential new premises on Rowans Estate.
<b>Site 34</b>	<b>Raleigh Gardens car park, Western Road,</b>	Close to Miles Road

	<b>Mitcham</b>	
<b>Site 35</b>	<b>Mitcham Fire Station</b>	Near Wilson and Miles Road.
<b>Site 36</b>	<b>Chaucer Centre, Morden</b>	Very near Faccini House which has capacity.
<b>Site 37</b>	<b>Wimbledon Greyhound Stadium</b>	If residential could be significant numbers. Nearest SMPCT surgeries are in Garrett Lane and Vineyard Hill neither has capacity. Capacity will be Steerforth Street (WPCT) and Tooting Health Centre in 2013.
<b>Site 38</b>	<b>Thames Water site, Bygrove Road, Colliers Wood</b>	New Colliers Wood premises would support this development.
<b>Site 39</b>	n/a	
<b>Site 40</b>	n/a	
<b>Site 41</b>	<b>Kingston Road, Raynes Park</b>	Between Nelson and Lambton Road and supported by these developments.
<b>Site 42</b>	n/a	
<b>Site 43</b>	n/a	
<b>Site 44</b>	n/a	
<b>Site 45</b>	n/a	
<b>Site 46</b>	<b>Old Lamp Works, High Path. Colliers Wood</b>	Merton Medical Practice nearest and should this development.
<b>Site 47</b>	n/a	
<b>Site 48</b>	<b>Bushey Road, Raynes Park</b>	Close to PCT border. Kingston practice in West Barnes Lane and Lambton Road in Raynes Park, late 2012.
<b>Site 49</b>	<b>Wimbledon Delivery Office, Cranbrook Road, Wimbledon</b>	Between Francis Grove and Lambton Road which should support this development
<b>Site 50</b>	<b>Waterside Way, Tooting</b>	Probably not residential.
<b>Site 51</b>	n/a	
<b>Site 52</b>	n/a	
<b>Site 53</b>	<b>Brook House, Cricket Green, Mitcham</b>	See Cricket Green grouped sites.
<b>Site 54</b>	n/a	
<b>Site 55</b>	<b>Field B, Grand Drive, Raynes Park</b>	Probably not residential.
<b>Site 56</b>	n/a	
<b>Site 57</b>	<b>Morden Station offices and Retail Units</b>	See Morden grouped sites.

<b>Site 58</b>	<b>Sainsbury's multi-storey car park, Morden</b>	See Morden grouped sites.
<b>Site 59</b>	<b>Baltic Close/Colliers Wood High Street corner</b>	New premises in Colliers Wood would support this development.
<b>Site 60</b>	<b>York Close car park, Morden</b>	See Morden grouped sites.
<b>Site 61</b>	n/a	
<b>Site 62</b>	<b>Wimbledon YMCA</b>	See Wimbledon grouped sites.
<b>Site 63</b>	<b>Highlands House site, Wimbledon Broadway</b>	See Wimbledon grouped sites.
	<b>Grouped Sites Wimbledon</b>	Major developments in central Wimbledon may create capacity issues which will be resolved with new capacity in at either site 62 or 22. Need presumption for health at these locations.
	<b>Grouped Sites Cricket Green, Mitcham</b>	If Wilson has long term capacity, this plus Miles Road and Rowans (if approved) can cope.
	<b>Grouped Sites Morden</b>	If significant numbers of extra residential, may require development of Site 24 could solve problems.

### **Appendix 3: TACKLING OVERWEIGHT AND OBESITY: PROMISING PRACTICE: Barking and Dagenham**