

PD11723/SD/LM

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3 January 2019

FutureMerton team
London Borough of Merton
Civic Centre
London Road
Morden
SM4 5DX*By Post and Email*
future.merton@merton.gov.uk

Dear Sir / Madam,

**REPRESENTATIONS ON BEHALF OF NHS PROPERTY SERVICES IN RELATION TO THE WILSON HOSPITAL,
CRANMER RD, LONDON CR4 4LD
NEW LOCAL PLAN STAGE 2 CONSULTATION**

On behalf of our Client, NHS Property Services Ltd (NHSPS), we write to submit representations to the London Borough of Merton ("the Council") in respect of their New Local Plan Stage 2 Consultation. Representations for The Birches have been submitted under separate cover.

The Site

The Wilson Hospital ("the site") is located at Cranmer Road, CR4 4LD. The site measures 1.81 hectares and contains a collection of permanent and temporary buildings with a total floorspace of 5,480 sq m. A site location plan can be found in **Appendix 1**.

The original building, located towards the front of the site, is locally listed and dates from 1928. This building has been extended a number of times and the central part extends to the rear of the site where two further wings project from either side. The central part is linked attached to another 1960s building which spans the majority of the rear boundary.

There is a large 1960s extension to the western side of the building, situated between the front and rear wings. To the front of the site by the main entrance there is a two storey lodge house building.

The remainder of the site is occupied by temporary structures, the most notable of which is located in the north east corner as a standalone temporary unit measuring 511 sq m.

The site has two vehicular access points off Cranmer road. There is a large surface car park on the western part of the site, with further parking to the east. There is a significant amount of green space and mature trees throughout, the largest being the south eastern corner and two smaller areas of kept green space to the front of the site.

The site is located approximately 650m from Mitcham Junction railway and tram station and is 1km south of Mitcham Town Centre, which is accessed by a bus link stopping directly outside of the hospital. The site has a PTAL rating of 3 and is connected to public transport links to Central London, Wimbledon, Morden, Sutton, Clapham Junction and Croydon.

The immediate context is predominantly residential. To the east of the site is Caesars Walk, a residential street characterised by two storey post-war semi-detached and terraced dwellings. To rear of the site are Cranmer Primary School playing fields containing a newly built building which extends to 9.6m in height. To the north is Cranmer Road (A239) which also provides access to the main Wilson Hospital site. Beyond this is a large green space known as Cranmer Green which is designated as metropolitan open land, open space, green corridor, green chain, local nature reserve and is within the Wandle Valley Regional Country Park.

Relevant Planning History

On the 5 February 1998 the Council granted planning permission (ref. 97/P0066) for a residential development on land within the site at the corner of Caesars Walk and Cranmer Road. The permission approved the erection of 11 two storey 3 bedroom houses, with associated off street car parking.

In 2004 the Secretary of State submitted a fresh application (ref. 04/P0355), which sought permission for the erection of 11 two storey 3 bedroom houses, with associated off street car parking (17 parking spaces). Access to the vehicle parking area was located opposite 11 Caesars Walk. On the 11 May 2004 the Council granted planning permission.

A number of other planning applications have been submitted on site for minor matters relation to estate management matters.

Based on historic planning applications and existing local policy, the lawful use of the site is considered to be in a D1 Use Class. This is confirmed in adopted Development Plan Documents which state the site's current use comprises:

“Health clinics relating to mental health, drugs and early intervention, and a GP surgery (D1 Use Class).”

NHSPS Strategy

In accordance with the representations previously submitted by NHSPS dated January 2018 and enclosed at **Appendix 2**, the clinical and planning strategy is for a health and wellbeing campus on the Wilson Site alongside residential development on any land not required for this new facility. , This aligns with the strategic intention of the Five Year Forward View. To reiterate previous representations, the delivery of an enhanced primary care model serving the population of East Merton is supported at a national level by the General Practice Forward view, published by the NHS England on 21 April 2016, and locally within the key priorities of the South West London STP.

NHSPS have worked collaboratively with the Local Planning Authority with regards to the delivery of intentions of the CCG Strategic Estates Plan, across both the Wilson Hospital site and the Birches.

Development Plan

The current development plan for the London Borough of Merton comprises:

- The London Plan (November 2016);
- Core Planning Strategy (July 2011);
- Sites and Policies Plan and Policies Map (2014).

The London Borough of Merton are in the process of preparing a New Local Plan, known as the Local Plan 2020. The new Local Plan will influence how the borough develops and grows over the next 15 years, with a plan period of 2020-2035.

The London Borough of Merton undertook Stage 1 consultation between October 2017 and January 2018. The Council are now undertaking a second round of consultation, and are currently consulting on Stage 2 of the New Local Plan. These representations have been submitted pursuant to Stage 2, and are consistent with the representations submitted by NHSPS pursuant to Stage 1.

A full copy of the previously submitted representations can be found at **Appendix 2**, and should be read alongside these representations.

Stage 2 New Local Plan – Mitcham

Draft Policy N3.2 has regards to Mitcham and sets out the Council's visions for Mitcham Town Centre and the surrounding area. Policy states that:

"To improve the overall environment of Mitcham surrounding areas by providing quality shopping, housing, community facilities and good transport links. The council will do this by:

- g. Supporting North Mitcham Local Centre: only supporting development that complements or improves the local or wider public realm;*
- h. Improving the quality and mix of homes including affordable and private housing;*
- i. Ensuring that development conserves and enhances the historic environment, for example, round Cricket Green, Canons House and Mitcham Common;*
- j. Enhancing the public realm through high quality urban design and architecture, and permitting development that makes a positive visual impact to the overall surroundings and connectivity to the town centre;*
- k. Supporting regeneration at Pollards Hill to optimise the provision of new homes and refurbish existing homes in a landscaped setting."*

The Draft Policy is clear that a range of uses, including residential and community uses are supported in principle within areas surrounding Mitcham Town Centre.

NHSPS are supportive of this draft policy and this aligns with the strategic intentions for the redevelopment of the Wilson Site.

Mitcham Sites – Wilson Hospital

The draft Merton Stage 2 Local Plan identifies a total of 19 sites in Mitcham for allocation and land designations.

The Wilson Site has a draft allocation under reference Mi18. The principle of the allocation of the site is supported in principle by the NHSPS, providing that in addition to the re-provision of healthcare facilities there is an ability through the allocation for the potential for other uses on the Site to come forward, namely residential.

The draft allocation, at a high level, sets out the potential use of the site, issues and opportunities. It is envisaged that the allocation will be refined as the New Local Plan develops through the plan making process.

The proposed use, issues and opportunities within the draft allocation, are addressed in turn, as follows.

Proposed Use

The draft allocation identifies the consultees suggested use, based on the responses received from the Stage 1 consultation.

The 'Consultee's Suggested Use' section acknowledges the NHSPS's suggested use of healthcare and residential, which was promoted in the last representations.

Mitcham Cricket Green Community and Heritage have also responded and suggested the following use:

"Health facilities, community and residential (new housing along Caesar's Walk only as exceptional enabling development to support community wellbeing services with ring fenced funding)."[our emphasis]

The proposed use of the Site for healthcare and residential is supported and promoted by NHSPS, and this ambition also aligns with the uses proposed by Mitcham Cricket Green Community and Heritage. The ambition for the site is to deliver a healthcare and wellbeing centre, which will integrate both healthcare and community uses.

The existing health use, which spans 5,480 sqm, is inefficient and underutilised. The redevelopment of the Site provides the opportunity to consolidate the health use, to create a health and wellbeing hub.

To make efficient use of brownfield land, in accordance with paragraph 117 of the NPPF, the strategy is to develop the remainder of the site for residential use. 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 on site, and would meet a demand / need.

The suggested use from the NHSPS therefore remains as a mix of uses comprising of healthcare and residential (C2 and C3), which is consistent with the existing allocation in the 2014 Sites and Policies Plan.

NHSPS object to ring fenced funding being referenced within the Site allocation. The funding and financial structure goes beyond the strategic control of NHSPS. We consider that in terms of planning policy and plan making, this reference is not relevant to the land allocation, and should therefore not be referred to within the allocation itself.

The Council's proposed site allocation is "Healthcare with community and enabling residential". Reference to enabling, is particularly onerous with regards to the deliverability of the Site and programme, as it infers that healthcare and residential uses will have to be brought forward together.

Further, the wording suggests that the residential use would be otherwise unacceptable, which is not justified given that the hospital is not statutorily listed and there is historical planning history where residential use was previously approved on the Site (04/P0355).

NHSPS's national funding model, does not allow for disposal receipts of surplus receipts to remain with local NHS organisations. This is explained within the Governments response to the Naylor Review, which states that;

'...properties owned by NHS Property Services are national rather than local assets, and are rented to local providers. When moving out of those properties, rental payments stop which creates a financial benefit to the provider. Therefore, capital receipts from the sale of NHSPS properties and land will continue to be pooled at a national level and the investment directed to where it is most needed by patients.'

It is therefore suggested that the proposed use is revised in the next consultation to read as:

"healthcare with community and residential (C2 and / or C3)."

Issues

The draft allocation goes on to list the identified issues with the Site. The issues comprise:

"Protecting the residential amenity of the adjacent properties.

*Protecting the habitat of the protected species that have been identified on/near the site in past ten years
i.e. Common Toads, Smooth Newts and Common Frogs.*

Investigating the potential impact of any proposed development on Archaeological heritage.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area."

The above constraints were identified by the NHSPS within the previous representations on page 13. The list presents constraints, as opposed to issues, and we would suggest that for the next consultation this section is retitled as "constraints".

Constraints can affect how a site can be developed, and it is acknowledged that these will have to be considered as part of the design development of any application at the Site.

Opportunities

The allocation lists three key opportunities for the Site, which are as follows:

*“Provide health and wellbeing functions for the local population.
Retention of the positive features of the Locally Listed building.
Respecting the character of this part of the Conservation Area.”*

It is acknowledged and supported that there is an opportunity to provide health and wellbeing functions for the local population.

The Site already functions as a health centre, and therefore it is suggested that an opportunity would be to deliver *“improved health and wellbeing functions for the local application”*. Furthermore, the site has suffered from the addition of utilitarian accretions and NHSPS recognises that redevelopment provides an opportunity to remove unsightly buildings, and deliver a mix of uses, positive features of the Locally Listed main hospital building.

It is acknowledged that the existing configuration of the Site is inefficient. As outlined in previous representation, there is significant Government pressure on the public sector to consolidate underutilised sites and make better use of sites, as part of a wider drive to modernise services. The consolidation of the Site provides the opportunity for an improved health care services, alongside residential uses

Of note, the list of opportunities does not refer to residential uses and mixed use development. The proposed use of the Site for residential is a clear opportunity, which aligns with draft Policy N3.2, which seeks to deliver housing in Mitcham. The proposed use of the Site for residential is a considerable benefit and NHSPS is committed to helping the Council meet either its general needs, or specialist housing requirements. We suggest that residential development is therefore listed as an opportunity.

Closing

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 of the issues raised in the representations please do not hesitate to contact myself or Lucy Mills at this office.

Yours sincerely,

Montagu Evans

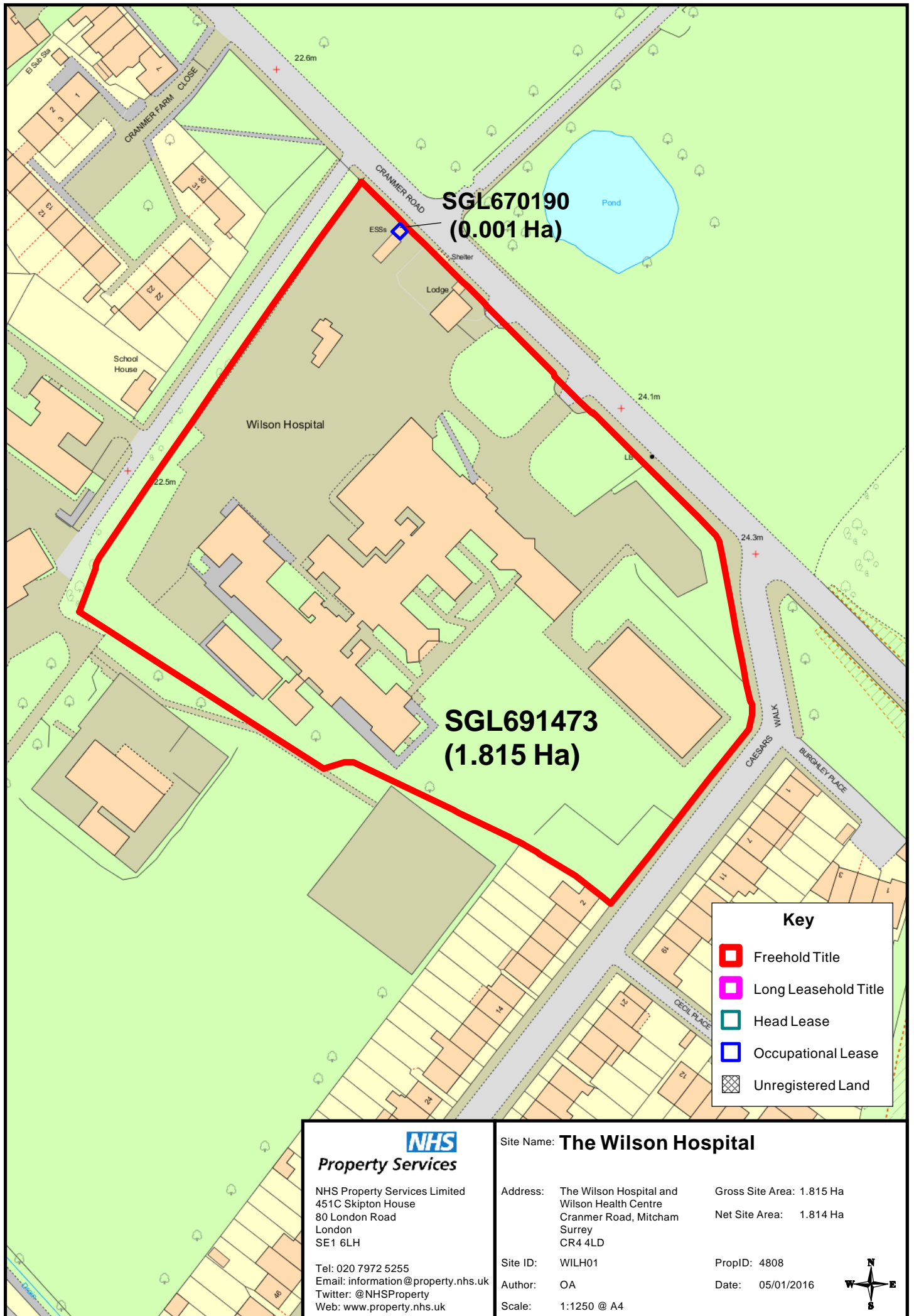
Sam Dalzell

Montagu Evans LLP

ENC.

cc	James McGinlay	Assistant Director for Sustainable Communities, LB Merton
	Victoria Shaw	NHS Property Services Ltd
	William Everson	NHS Property Services Ltd

Appendix 1



**SGL670190
(0.001 Ha)**

**SGL691473
(1.815 Ha)**

Key

- Freehold Title
- Long Leasehold Title
- Head Lease
- Occupational Lease
- Unregistered Land

NHS
Property Services

NHS Property Services Limited
451C Skipton House
80 London Road
London
SE1 6LH

Tel: 020 7972 5255
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Twitter: @NHSPROPERTY
Web: www.property.nhs.uk

Site Name: **The Wilson Hospital**

Address: The Wilson Hospital and
Wilson Health Centre
Cranmer Road, Mitcham
Surrey
CR4 4LD

Site ID: WILH01
Author: OA
Scale: 1:1250 @ A4

Gross Site Area: 1.815 Ha
Net Site Area: 1.814 Ha

PropID: 4808
Date: 05/01/2016



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Appendix 2

Wilson Hospital

Cranmer Road, Merton

Development Statement

Submitted in response to London Borough of Merton
call for sites with regard to the new local plan



January 2018



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Introduction

This Development Statement has been prepared by NHS Property Services Ltd (NHSPS) and should be read in conjunction with the Wilson Hospital Development Statement. It supports clinical and planning strategies across the two, which intend to consolidate and improve existing facilities in the area, whilst considering the scope for residential development on each site.

A separate submission has been prepared for each site. This submission is concerned with the promotion of the Birches as a development site.

The document describes constraints and opportunities presented by the site and an overview of the key technical considerations, demonstrating that the site is available, suitable and achievable, and therefore capable of delivering new homes to contribute towards meeting both future housing and healthcare needs in the London Borough of Merton.

Existing Situation

Both the Wilson and the Birches benefit from an existing site allocation within Merton's Sites and Policies Plan 2014. Site Proposal 20 allocates the Wilson Hospital as a mixed use development site for uses including a nursing home (C2 Use Class), residential (C3 Use Class), community and health (D1 Use Class). Whilst Site Proposal 21 allocates The Birches for a mixed use dwellings (C3 Use Class), community (D1 Use Class) and health (D1 Use Class).

It is well understood that the Council require comfort that the long-term health needs of the local community can be met, and both allocations provide for flexibility in how this can be delivered. As such, both sites have the potential for either a mixture or single development use, in accordance with their allocations. Importantly, development across the two should be healthcare led.

NHS Strategy

A health and wellbeing campus on the Wilson site is preferred and closely aligned to the strategic intention of the Five Year Forward View. The delivery of an enhanced primary care model serving the population of East Merton is supported at a national level by the General Practice Forward View, published by NHS England on 21 April 2016, but also locally within the key priorities of the South West London STP.

The alignment with these strategic intentions and priorities is further reiterated within the CCG Strategic Estates Plan, which sets out the intention to invest in the development of the healthcare estate in East Merton and specifically the establishment of a hub on the Wilson site.

Close ongoing partnership working is needed with the Local Authority to deliver the redevelopment of the Wilson site and both The Wilson Hospital and The Birches Call for Sites submissions support this approach.

The remainder of this document is structured as follows:

- Site Location and Description
- Planning History
- Planning Policy Context
- A Deliverable Site
- Illustrative Masterplan
- Summary and Conclusion.



Fig.1 Front of site



Fig.2 Site location plan

Site boundary
 Mitcham Cricket Green Conservation Area

Site Location and Description

Wilson Hospital

Wilson Hospital ("the site") is located at Cranmer Road, CR4 4LD as shown in Figure 7, measures 1.81 hectares and contains a collection of buildings with a total floorspace of 5,480 sq m.

The original building, located towards the front of the site, is locally listed and dates from 1928. This building has been extended a number of times and the central part extends to the rear of the site where two further wings project from either side. The central part is linked to another 1960s building which spans the majority of the rear boundary.

To the front of the site by the main entrance there is a two storey lodge house building.

The site has two vehicular access points off Cranmer road. There is a large surface car park on the western part of the site, with further parking to the east. Open space and mature trees exist across the remainder, the largest located in the south-eastern corner with two smaller areas of kept green space to the front.

Context of the Surrounding Area

The site is located approximately 650m from Mitcham Junction railway and tram station and is 1km south of Mitcham Town Centre, which is accessed by a bus link stopping directly outside of the hospital. The site has a PTAL rating of 3 and is connected to public transport links to Central London, Wimbledon, Morden, Sutton, Clapham Junction and Croydon.

The immediate context is predominantly residential. To the east of the site is Caesars Walk, a residential street characterised by two storey post-war semi-detached and terraced dwellings. To rear of the site are Cranmer Primary School playing fields containing a newly built building which extends to 9.6m in height. To the north is Cranmer Road (A239) which also provides access to the main Wilson Hospital site. Beyond this is a large green space known as Cranmer Green which is designated as metropolitan open land.



Fig.3 Existing hospital building looking west



Fig.4 The existing Wilson Hospital building looking east



Fig.5 Caesars Walk residential buildings viewed from site



Fig.6 Cranmer Primary School viewed from site



Fig.7 Wilson Hospital existing site plan

- Key
- Locally listed building
 - Buildings that make a positive contribution
 - ⊙ Gateway to conservation area
 - Significant open space
 - Conservation area boundary
 - Site boundary

Planning History

Wilson Hospital

Applications Relating to the Site

The key relevant applications on this site are set out below.

i. 1998 Residential Permission and 2003 Renewal Appeal

On the 5 February 1998 the Council granted planning permission (ref. 97/P0066) for a residential development on land within the site at the corner of corner of Caesars Walk and Cranmer Road. The permission approved the erection of 11 two storey 3 bedroom houses, with associated off street car parking.

We believe this permission was due to expire on 5 February 2003 and on that day NHS Executive South Thames submitted an application to renew the permission (ref. 03/P0216).

This application was not implemented and therefore has expired.

ii. 2004 Residential Permission

The Secretary of State submitted a fresh application on 23 February 2004 (ref. 04/P0355). This application also sought permission for the erection of 11 two storey 3 bedroom houses, with associated off street car parking (17 parking spaces). Access to the vehicle parking area was located opposite 11 Caesars Walk.

On the 11 May 2004 the Council granted planning permission. We understand that this permission was also not implemented and subsequently expired on the 11 May 2009.

Lawful Planning Use

Based on historic planning applications, and existing local policy, the site is considered to be in a D1 Use Class. This is confirmed in adopted Development Plan Documents which state the site's current use comprises:

“Health clinics relating to mental health, drugs and early intervention, and a GP surgery (D1 Use Class).”

Planning Policy Context

The Development Plan for the London Borough of Merton comprises:

- ***The London Plan (November 2016)***
- ***Core Planning Strategy (adopted July 2011)***
- ***Sites and Policies Plan and Policies Map (adopted July 2014)***

The Council's latest Local Development Scheme, published in September 2016, indicates that the next consultation of relevance to this site will relate to the draft Local Plan Development Plan Document. This document was scheduled to be published for its first round of public consultation in Autumn 2017.

In October 2016 the current Mayor of London, Sadiq Khan, outlined his plans and timetable to prepare and publish a new London Plan. The Draft London Plan has now been published for public consultation.

- Draft London Plan consultation November 2017 – March 2018.
- Examination in Public (EiP) Summer 2018.
- Publication of final London Plan Autumn 2019.

The development of the site is therefore set within a changing policy context. Below we outline some of the relevant key existing and emerging policies.

Housing

Merton's housing policies seek to take advantage of opportunities to deliver housing, with the key objective of increasing housing supply in residential areas, through physical regeneration and effective use of space. Brownfield sites in locations with good transport connections are prioritised. The site is brownfield land with a PTAL rating of 3.

Policy CS9 sets out that Merton is required to deliver in the region of 4,800 new dwellings by 2026 (2011–2026). However, this has been superseded by the Further Alterations to the London Plan (adopted in 2015), which set a housing target for Merton of 4,107 during the period 2015 to 2025, equivalent to 411 net additional homes per annum.

Revised figures set out in the draft London Plan (2017) set an ambitious target of 65,000 new homes each year across London. Merton will have to deliver 1,328 of these p.a., which represents a 223% increase on existing annual requirements, the greatest uplift of all London boroughs. To deliver this, a presumption in favour of residential infilling, the densification of existing schemes within PTALs 3–6 or within 800m of a Tube or rail station, or a town centre, will be implemented.

Five Year Housing Supply

The London Borough of Merton has a robust five year supply identified within the 15/16 Authority Monitoring Report (AMR). Housing projected provision exceeds both the annual target and the additional 5% buffer for the next 7 years.

Planning Policy Context

Protection for Existing Health Care Uses

Policy CS11 (Infrastructure) seeks to support the provision and improvement of infrastructure. Part D of the policy supports the provision of improved health services, in particular those identified by Sutton and Merton Primary Care Trust and any successor commissioners.

Policy DM C1 Community facilities links to Core Planning Strategy Policy CS 11 Infrastructure and states:

Proposals for new development and improvements (including expansion) to existing community facilities, health and places of worship will be supported where all the following criteria are met:

- i. *services are co-located where possible;*
- ii. *facilities are provided in accessible locations with good links to public transport;*
- iii. *the size of the development proposed is in relation to its context; iv. appropriate access and parking facilities are provided, relative to the nature and scale of the development;*
- iv. *the proposed facilities are designed to be adaptable and suitable to accommodate a range of services; and*
- v. *the use(s) do not have an undue adverse impact on the amenities of nearby residents and businesses.*
 - a. *Any redevelopment proposals resulting in a net loss of existing community facilities will need to demonstrate that:*
 - i. *the loss would not create, or add to, a shortfall in provision for the specific community uses; and*
 - ii. *that there is no viable demand for any other community uses on the site.*

Redevelopment or change of use of sites used for health facilities should not result in inadequate provision or poor accessibility to healthcare for residents.

Car Parking

In determining the appropriate level of on-site parking at this location, regard should be given to Policy 6.13 (Parking) of the 2016 London Plan. This allows for 'up to one space per [residential] unit'.

Parking capacity for health-care uses would need to reflect operational requirements.

Planning Policy Context

Matters relating to Wilson Hospital

Key Designations

The site is within the Mitcham Cricket Green conservation area, and the hospital building is a locally listed building. The site is also located within an archaeological priority zone.

A part of the site is designated as green corridor. The Cranmer Green to the northeast of the site is designated as Metropolitan Open Land, open space, green corridor, green chain, local nature reserve and is within the Wandle Valley Regional Country Park.

The northeast portion of the site is within a critical drainage area.

Site Allocation

The Wilson Hospital Site is allocated in the Council's Sites and Policies Plan July 2014 for a mixed use development (Site Proposal 20). The allocation

identifies suitable uses including a nursing home (C2 Use Class), residential (C3 Use Class), community and health (D1 Use Class).

If the Local Care Centre is to be located at another site then the Council consider that the site has potential for community uses including education (D1 Use Class), and/or a nursing home (C2 Use Class), and/or residential (C3 Use Class).

It's considered the sites size and location gives it potential for a range of uses. If the Local Care Centre is to be located on this site then a healthcare (D1 Use Class) led mixed use scheme that may include some 'residential institution' type accommodation (C2 Use Class) and/or some residential (C3 Use Class) would be acceptable.

If the Local Care Centre is to be located at another site then the Council consider that the site has potential for community uses including education (D1 Use Class), and/or a nursing home (C2 Use Class), and/or residential (C3 Use Class).

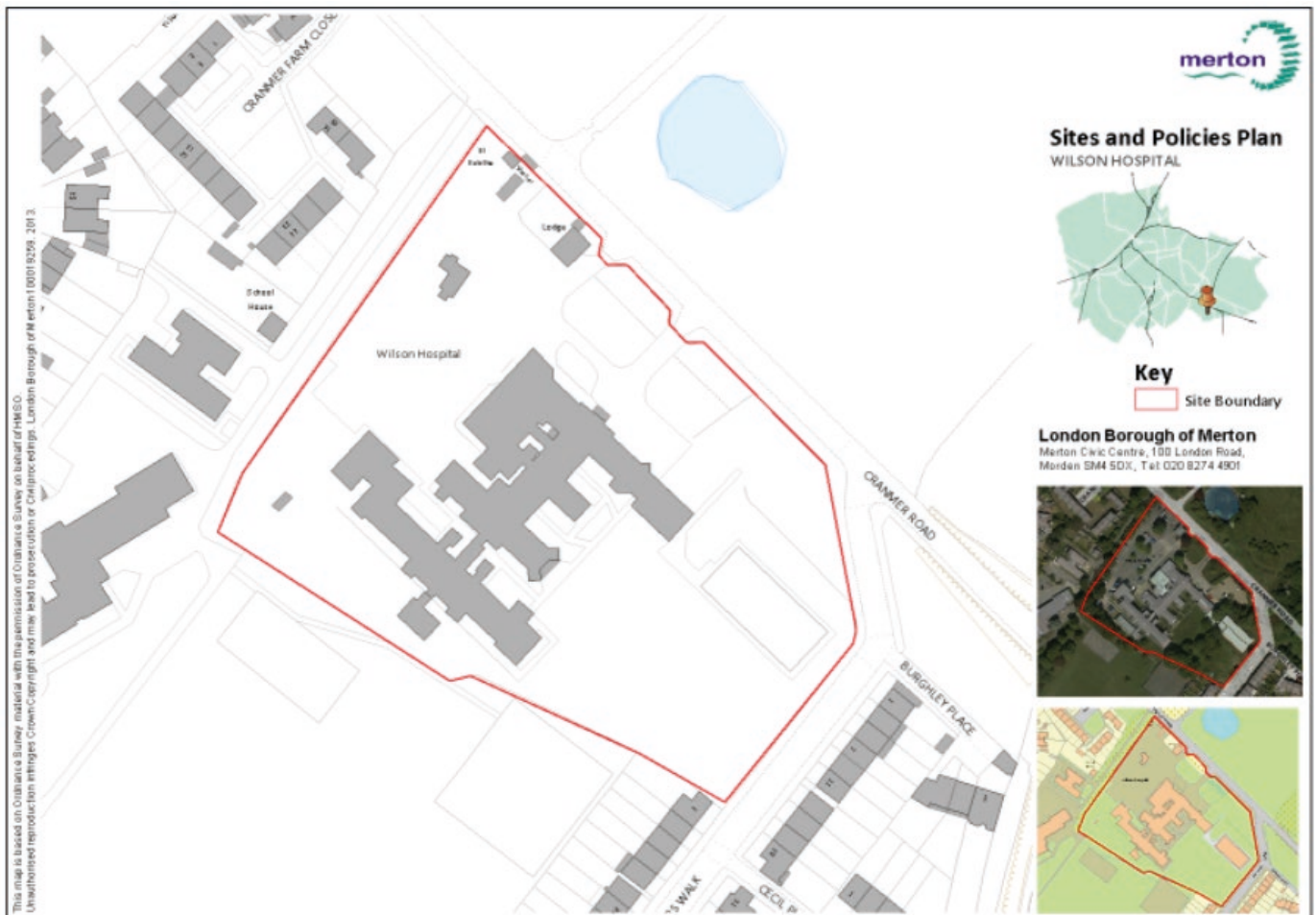


Fig.8 LB Merton Sites and Policies Plan Extract – Site Proposal 20
Wilson Hospital, Cranmer Road Development Statement

A Deliverable Site

Footnote 11 to Paragraph 47 of the National Planning Policy Framework confirms that to be considered deliverable, sites should be available, offer a suitable location for development, and be achievable with a realistic prospect that housing can be delivered within the next 5 years.

Available

The current Hospital is occupied by various primary care services. The site is under the ownership of NHSPS and has been identified as an underutilised site, in need of modernisation and suitable for intensification. NHSPS are exploring options for the site's redevelopment in order to secure funds for improved services onsite.

An essential element of supporting the wider transformation of NHS services and the Health Estate is to ensure NHS sites are not strategically or specifically constrained by local planning policies.

A redevelopment could deliver a hub facility, co-locating and consolidating GP and other health services on site and new homes. The site is therefore available for development/delivery within the next 5 years.

Suitable

It has been demonstrated that the site is in a sustainable location, capable of supporting a mix of residential/healthcare uses. The suitability of the site for residential use is further confirmed by the existing allocation, which identifies suitable uses including residential (C3 Use Class), community and health (D1 Use Class). With the introduction of other uses on the site, we believe the proposals offer the ability to provide a high quality and inclusive residential development, contributing towards housing land supply, whilst responding to local healthcare demands.

Achievable

NHSPS have been working with commissioners and architects to design a scheme which has considered both commissioning strategies and the physical characteristics of the site, along with other technical factors. It is confirmed that development of the site is achievable. NHSPS are confident that the site could be developed for residential development, with a layout appropriate to its setting and healthcare requirements. The following provides a summary of the technical considerations associated with development of the site.

Access and highways

As discussed, existing vehicular access to the site is currently provided from the southern side of Cranmer Road by way of an in-out access arrangement. Car parking is situated on-site on both eastern and western sides of the building and at its frontage. Pedestrian access is also from Cranmer Rd.

It is thought existing accesses could be retained, albeit changed to accommodate two-way movements at each of the access points. The north-western access could provide access and egress for the new NHS facility on site, whilst the south-eastern access could be retained for the residential use. Visibility splays are achievable from the existing egress (north-western access point) in both directions from a set-back distance of 2.4 metres. Suitable visibility splays can be achieved in both directions, including up to the mini-roundabout junction to the west of the access.



Fig.9 Broad development area

■ Proposed developed land
 ■ Existing developed land
 ■ Green Corridor

Flood Risk and Drainage

The site is within an area with critical drainage. At an appropriate time, engineers should be appointed to prepare a Flood Risk Assessment and advise on measure to minimise surface run-off and the use of SuDS, having regard to Policy CS16 (Flood Risk Management) of the 2011 Core Strategy, and Policy DM F1 (Support for Flood Risk Management) and Policy DM F2 (Sustainable Urban Drainage Systems (SuDS) and; Wastewater and Water Infrastructure) of the 2014 Sites and Policies Plan and Policies Map document.

Utilities

It is anticipated that residential development on the site will be able to connect to the existing utilities networks which currently serve the site. The presence of necessary utilities networks in the area is evident given that the site is adjacent to residential development. Further investigations and enquiries would reveal any improvement works or on-site provision deemed necessary.

Green Infrastructure

There are a number of trees onsite. Moreover, the site is within a conservation and therefore the trees are afforded protection.

Design proposals will aim to achieve enhancement on the current ecological value, retaining trees where possible and replacing those trees being removed.

Heritage and Archaeology

The site is within Mitcham Cricket Green Conservation Area, where it is identified as an attractive local landmark. As the hospital building is locally listed its positive features should be retained and enhanced where possible.

It is anticipated that the introduction of residential uses could improve upon the setting or significance of the locally listed buildings and Conservation Area. Proposals for the redevelopment of the site would consider options for this heritage asset as part of a detailed Heritage Statement.

The site is within an Archaeological Priority Zone. An Archaeological Assessment would need to be prepared in support of any planning application.

Illustrative Masterplan

The Wilson

The site is previously developed land currently occupied by the Wilson Hospital, with good potential for redevelopment. Given that the site benefits from an existing allocation for a D1, C2 and C3 or mixed use development, the general principle of residential development on the site is already accepted.

NHSPS have been working closely with commissioners to establish the most suitable location for the delivery of a new hub in this part of the borough, and this is closely aligned to the strategic intention of the Five Year Forward View. NHSPS also welcome the opportunity to work with the Council and the local community to bring the site forward to deliver a new NHS facility and new homes in this part of the borough.

In that context, review of the site and its development potential considers and promotes the allocation for mixed use development.

An illustrative layout has been prepared for the site to underline its development potential and positive relationship with the wider area, as a basis for further discussion with the Council and the local community.

Site Constraints and Opportunities

The provision of a mix of uses on this site, including healthcare and residential complies with relevant Council planning policies, as well as those respective policies within the London Plan.

The site is within the Mitcham Cricket Green conservation area and an archaeological priority zone. The hospital building is locally listed, but has suffered from the addition of utilitarian accretions over many years and redevelopment provides an opportunity to remove unsightly buildings, deliver new housing, associated parking and open spaces that enhance the heritage asset and create a distinctive and successful place that complements the adjoining communities.

The wider context is a mix of housing types offering significant scope for a varied design approach on the site, whilst still contributing to local character of the conservation area.

Key opportunities offered by the site include;

- Providing a new, fit for purpose and flexible healthcare facility
- Contributing towards meeting local housing need
- Providing new, mixed tenure homes
- Improving the setting of a locally listed building
- Improving the character of the Conservation Area
- Utilising previously developed public sector land
- Promoting sustainable living through the delivery of new homes in an accessible location well served by public transport.



Fig.10 Illustrative development framework

- Key**
- Proposed developed land
 - Existing developed land
 - Green corridor
 - Entrance
 - Access

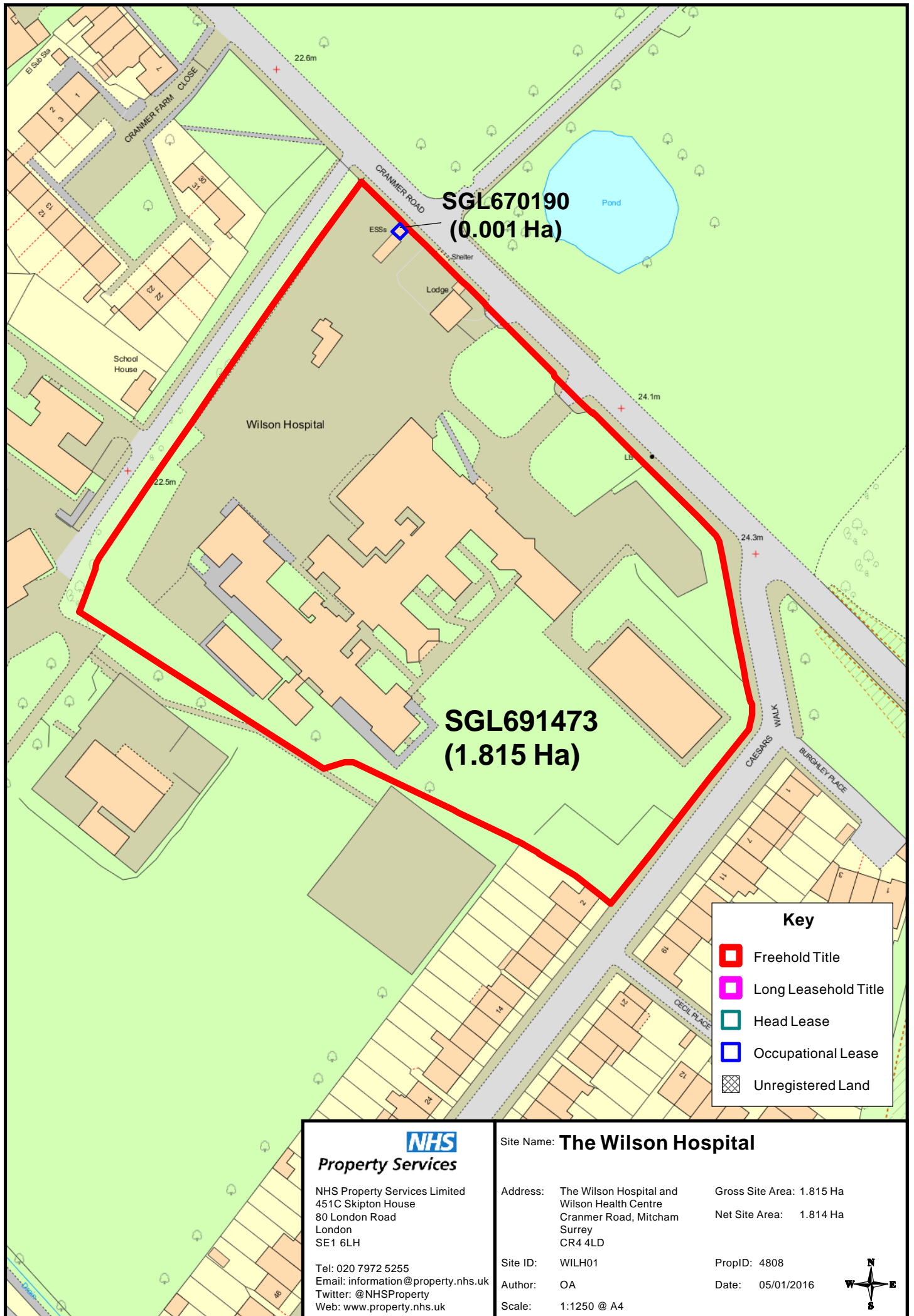
Potential Development Capacity	
1,2 & 3 Bed Apartments	15–20 No.
3 Bed Townhouses	10 No.
Refurbished Apartments	6–9 No.

Summary and Conclusion

There is significant Government pressure on the public sector to intensify underutilised sites through co-location or consolidation of facilities and services. The site is part of a wider drive to modernise services in this part of the borough and could successfully deliver a new Local Care Centre and residential development, providing an opportunity to rationalise the community estate and fund new healthcare facilities.

NHSPS is fully committed to helping the Council meet its housing requirements and will therefore support the sites inclusion within the Local Plan. This will help facilitate the development and the establishment of a clear healthcare strategy in this location, providing improved health services for the local community which are sufficiently flexible to meet anticipated growth and demand.





**SGL670190
(0.001 Ha)**

**SGL691473
(1.815 Ha)**

Key

- Freehold Title
- Long Leasehold Title
- Head Lease
- Occupational Lease
- Unregistered Land

NHS
Property Services

NHS Property Services Limited
451C Skipton House
80 London Road
London
SE1 6LH

Tel: 020 7972 5255
Email: information@property.nhs.uk
Twitter: @NHSPROPERTY
Web: www.property.nhs.uk

Site Name: **The Wilson Hospital**

Address: The Wilson Hospital and Wilson Health Centre Cranmer Road, Mitcham Surrey CR4 4LD	Gross Site Area: 1.815 Ha Net Site Area: 1.814 Ha
Site ID: WILH01	PropID: 4808
Author: OA	Date: 05/01/2016
Scale: 1:1250 @ A4	



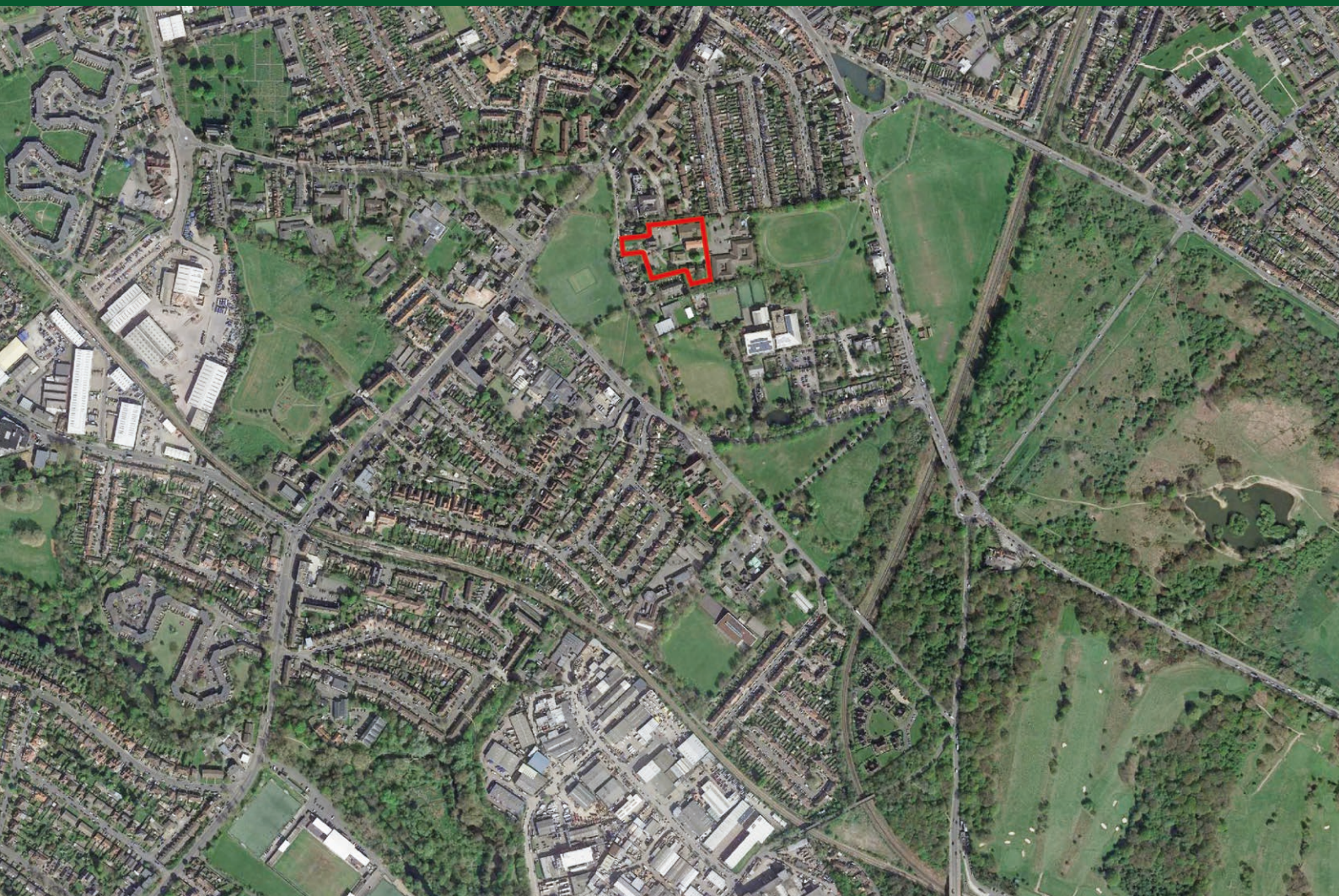
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Birches Close

Cricket Green, Merton

Development Statement

Submitted in response to London Borough of Merton
call for sites with regard to the new local plan



January 2018



St. Francis
Eye Clinic

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Planning Policy Context	07
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Introduction

This Development Statement has been prepared by NHS Property Services Ltd (NHSPS) and should be read in conjunction with the Wilson Hospital Development Statement. It supports clinical and planning strategies across the two, which intend to consolidate and improve existing facilities in the area, whilst considering the scope for residential development on each site.

A separate submission has been prepared for each site. This submission is concerned with the promotion of the Birches as a development site.

The document describes constraints and opportunities presented by the site and an overview of the key technical considerations, demonstrating that the site is available, suitable and achievable, and therefore capable of delivering new homes to contribute towards meeting both future housing and healthcare needs in the London Borough of Merton.

Existing Strategy

Both the Wilson and the Birches benefit from an existing site allocation within Merton's Sites and Polices Plan 2014. Site Proposal 20 allocates the Wilson Hospital as a mixed use development site for uses including a nursing home (C2 Use Class), residential (C3 Use Class), community and health (D1 Use Class). Whilst Site Proposal 21 allocates The Birches for a mixed use dwellings (C3 Use Class), community (D1 Use Class) and health (D1 Use Class).

It is well understood that the Council require comfort that the long-term health needs of the local community can be met, and both allocations provide for flexibility in how this can be delivered. As such, both sites have the potential for either a mixture or single development use, in accordance with their allocations. Importantly, development across the two should be healthcare led.

NHS Strategy

A health and wellbeing campus on the Wilson site is preferred and closely aligned to the strategic intention of the Five Year Forward View. The delivery of an enhanced primary care model serving the population of East Merton is supported at a national level by the General Practice Forward View, published by NHS England on 21 April 2016, but also locally within the key priorities of the South West London STP.

The alignment with these strategic intentions and priorities is further reiterated within the CCG Strategic Estates Plan, which sets out the intention to invest in the development of the healthcare estate in East Merton and specifically the establishment of a hub on the Wilson site.

Close ongoing partnership working is needed with the Local Authority to deliver the redevelopment of the Wilson site and both The Wilson Hospital and The Birches Call for Sites submissions support this approach.

The remainder of this document is structured as follows:

- Site Location and Description
- Planning History
- Planning Policy Context
- A Deliverable Site
- Illustrative Masterplan
- Summary and Conclusion.



Fig.1 Front of site



Fig.2 Site location plan

▭ Site boundary
 ▭ Mitcham Cricket Green Conservation Area

Site Location and Description

Birches Close

Birches Close ("the site") is located at Birches Close, Mitcham, Surrey, CR4 4LQ as shown in Figure 6. The site measures 0.969 hectares and comprises a cul-de-sac with eight buildings of varying size arranged off Birches Close.

There is a single point of vehicular access / egress to Birches Close off Cricket Green, and there are areas of formal surface parking across the site providing space for circa 50 cars.

The buildings range between one and two storeys in height, and all have brick façades and pitched roofs.

Context of the Surrounding Area

The areas around the site are mixed in terms of land use and building typology.

To the north of the site is an independent primary school (Date Valley School) and residential dwellings, including flatted apartments (three storey) and terraced houses (two storey).

To the east of the site are office uses and residential institutional uses (Cumberland Care Home).

To the south is a leisure centre, which provides three artificial grass pitches, a bowling green, a church and small terrace of residential dwellings (two storey).

To the west of the site are large detached and semi-detached residential dwellings off Cricket Green road, beyond which is the Cricket Green and a larger area of open green space. There are three listed buildings located adjacent or near to the site access / egress to Cricket Green, including The White House (Grade II), Chestnut Cottage (Grade II) and Elm Lodge (Grade II).

There are regular TfL bus service operating along London Road (A217) and Cricket Green (A239) and Mitcham Junction National Rail station is approximately 1.25 kilometres to the south-east of the site.

The western part of the site is located within an area of PTAL rating 4, and the eastern part is within an area of PTAL rating 2 on the Transport for London's WebCAT mapping service. We have assumed for this report an average PTAL rating across the site of 3.



Fig.3 View of the entrance from Cricket Green



Fig.4 Existing clinical buildings to rear of site



Fig.5 View of the grade II listed buildings (No.7&9) Cricket Green



Fig.6 Birches Close existing site plan

- Key**
- Listed building
 - Locally listed building
 - Buildings that make a positive contribution
 - Buildings that make a negative impact
 - Negative feature
 - Significant open space
 - Conservation area boundary
 - Site boundary

Planning History

Birches Close

Applications Relating to the Site

i. 2010 Appeal Scheme A and B

On the 22 October 2010 four planning appeals made by Sutton and Merton Primary Care Trust against decisions of the London Borough of Merton were dismissed. The applications were as follows:

- Appeal Scheme A (52 dwelling scheme) comprised applications for planning permission (ref. 09/P1528)
- Appeal Scheme B (35 Unit Scheme) comprised applications for planning permission (ref. 10/P0153)

The Inspector dismissed Appeal Scheme A on heritage and design grounds.

The Inspector dismissed Appeal Scheme B, which addressed the built form reason for which Appeal A was dismissed, due to the informal quality of the approach to Birches House, the appeal was dismissed.

Planning Policy Context

The Development Plan for the London Borough of Merton comprises:

- ***The London Plan (November 2016)***
- ***Core Planning Strategy (adopted July 2011)***
- ***Sites and Policies Plan and Policies Map (adopted July 2014)***

The Council's latest Local Development Scheme, published in September 2016, indicates that the next consultation of relevance to this site will relate to the draft Local Plan Development Plan Document. This document was scheduled to be published for its first round of public consultation in Autumn 2017.

In October 2016 the current Mayor of London, Sadiq Khan, outlined his plans and timetable to prepare and publish a new London Plan. The Draft London Plan has now been published for public consultation.

- Draft London Plan consultation November 2017 – March 2018.
- Examination in Public (EiP) Summer 2018.
- Publication of final London Plan Autumn 2019.

The development of the site is therefore set within a changing policy context. Below we outline some of the relevant key existing and emerging policies.

Housing

Merton's housing policies seek to take advantage of opportunities to deliver housing, with the key objective of increasing housing supply in residential areas, through physical regeneration and effective use of space. Brownfield sites in locations with good transport connections are prioritised. The site is brownfield land with a PTAL rating of 3.

Policy CS9 sets out that Merton is required to deliver in the region of 4,800 new dwellings by 2026 (2011-2026). However, this has been superseded by the further Alterations to the London Plan (adopted in 2015), which set a housing target for Merton of 4,107 during the period 2015 to 2025, equivalent to 411 net additional homes per annum.

Revised figures set out in the draft London Plan (2017) set an ambitious target of 65,000 new homes each year across London. Merton will have to deliver 1,328 of these p.a., which represents a 223% increase on existing annual requirements, the greatest uplift of all London boroughs. To deliver this, a presumption in favour of residential infilling, the densification of existing schemes within PTALs 3–6 or within 800m of a Tube or rail station, or a town centre, will be implemented.

Five Year Housing Supply

The London Borough of Merton has a robust five year supply identified within the 15/16 Authority Monitoring Report (AMR). Housing projected provision exceeds both the annual target and the additional 5% buffer for the next 7 years.

Planning Policy Context

Protection for Existing Health Care Uses

Policy CS11 (Infrastructure) seeks to support the provision and improvement of infrastructure. Part D of the policy supports the provision of improved health services, in particular those identified by Sutton and Merton Primary Care Trust and any successor commissioners.

Policy DM C1 Community facilities links to Core Planning Strategy Policy CS 11 Infrastructure and states:

Proposals for new development and improvements (including expansion) to existing community facilities, health and places of worship will be supported where all the following criteria are met:

- i. *services are co-located where possible;*
- ii. *facilities are provided in accessible locations with good links to public transport;*
- iii. *the size of the development proposed is in relation to its context; iv. appropriate access and parking facilities are provided, relative to the nature and scale of the development;*
- iv. *the proposed facilities are designed to be adaptable and suitable to accommodate a range of services; and*
- v. *the use(s) do not have an undue adverse impact on the amenities of nearby residents and businesses.*
 - a. *Any redevelopment proposals resulting in a net loss of existing community facilities will need to demonstrate that:*
 - i. *the loss would not create, or add to, a shortfall in provision for the specific community uses; and*
 - ii. *that there is no viable demand for any other community uses on the site.*

Redevelopment or change of use of sites used for health facilities should not result in inadequate provision or poor accessibility to healthcare for residents.

Car Parking

In determining the appropriate level of on-site parking at this location, regard should be given to Policy 6.13 (Parking) of the 2016 London Plan. This allows for 'up to one space per [residential] unit'.

Parking capacity for health-care uses would need to reflect operational requirements.

Planning Policy Context

Matters relating to Birches Close

Key Designations

The Birches Close site is also within the Mitcham Cricket Green Conservation Area and an Archaeological Priority Zone and portions of the north, east and west of the site are within a Critical Drainage Area.

Site Allocation

The Birches Close site is allocated in the Council's Sites and Policies Plan July 2014 for a mixed use development (Site Proposal 21) which is very similar to the Wilson Hospital allocation. The allocation identifies suitable uses including some 'residential institution' type accommodation (C2 Use Class), residential (C3 Use Class), community and health (D1 Use Class).

As with the Wilson Hospital allocation, the Council consider that the site's size and location gives it potential for a range of community uses (D1 Use Class) in whole or in part including healthcare and education.

If the Local Care Centre is to be located on this site then a healthcare (D1 Use Class) led mixed use scheme that may include some 'residential institution' type accommodation (C2 Use Class) and/or some residential (C3 Use Class) would be acceptable.

If the Local Care Centre is to be located at another site then the Council consider that the site has potential for community uses including education (D1 Use Class), and/or a nursing home (C2 Use Class), and/or residential (C3 Use Class).

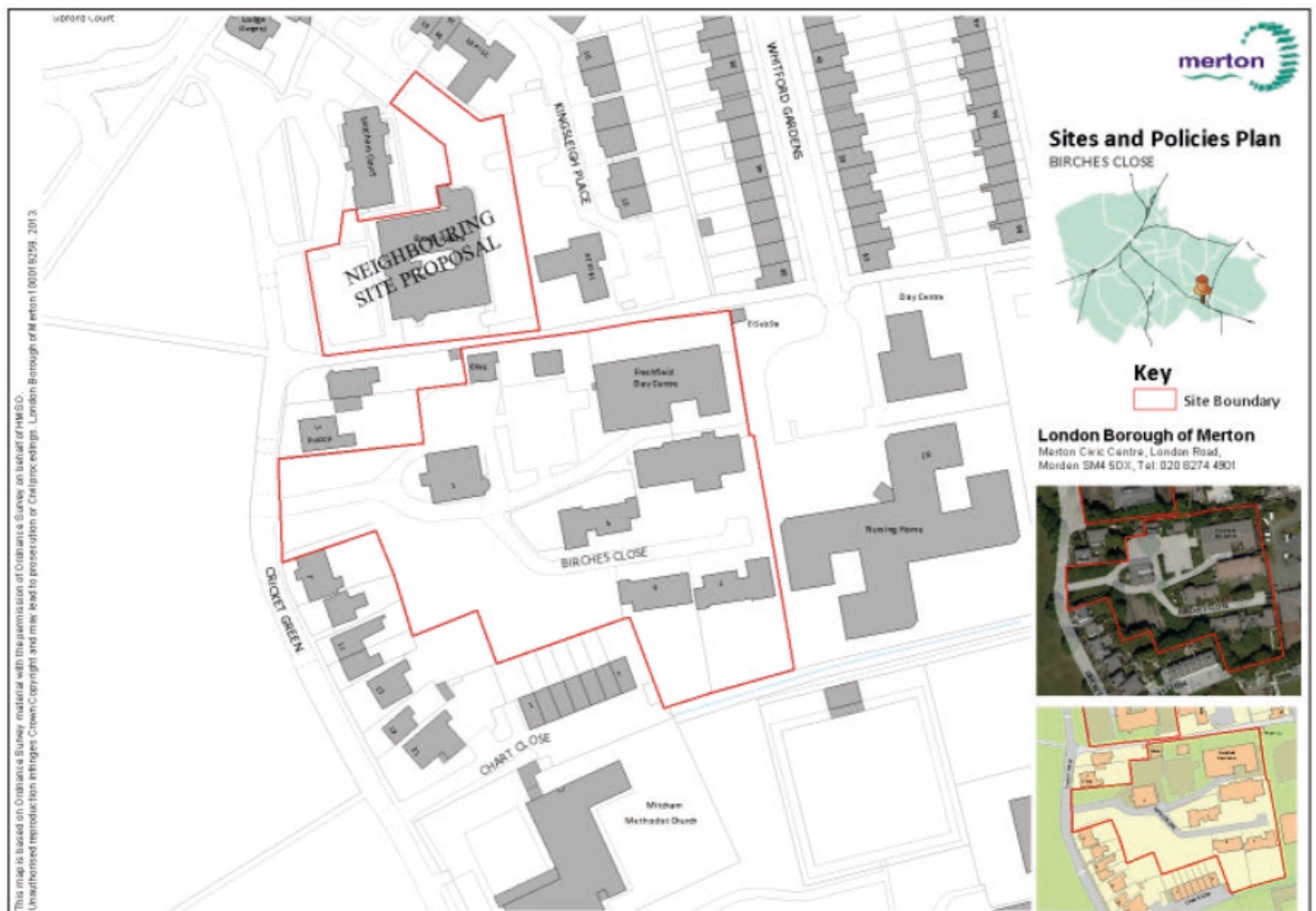


Fig.7 LB Merton Sites and Policies Plan Extract – Site Proposal 21
Birches Close, Mitcham Development Statement

A Deliverable Site

Footnote 11 to Paragraph 47 of the National Planning Policy Framework confirms that to be considered deliverable, sites should be available, offer a suitable location for development, and be achievable with a realistic prospect that housing can be delivered within the next 5 years.

Available

The site is under the ownership of NHSPS and is currently poorly utilised with significant void space. A number of buildings onsite have suffered from dilapidation and require investment to modernise them. Furthermore, the high ratio of circulation space to useful area within many of the existing buildings, together with confusing and inefficient internal layouts, renders refurbishment and adaptation impractical and poor value for money.

An essential element of supporting the wider transformation of NHS services and the Health Estate is to ensure NHS sites are not strategically or specifically constrained by local planning policies. The consolidation of services to a single hub in this part of the borough may result in The Birches becoming surplus to operational requirements.

In this regard, the site is therefore considered available for redevelopment and could deliver a new residential development within the next 5 years.

Suitable

The site is sustainably located, capable of supporting a mix of residential uses. The suitability of the site for residential use is further confirmed by the existing allocation, which identifies suitable uses including residential (C3 Use Class), community and health (D1 Use Class). We believe proposals offer the chance to provide a high quality and inclusive residential development which improve the setting of locally listed building, enhance the conservation area and contribute towards housing land supply.

Achievable

NHSPS have been working with commissioners to design a scheme which has taken into account both physical characteristics and clinical strategies of the site, along with other technical factors. It is confirmed that development of the site is achievable. NHSPS feel the site could be developed for between 45–60 dwellings, with a layout appropriate to its setting. The following provides a summary of the technical considerations associated with development of the site.

Access and highways

As discussed, there is a single point of vehicular access/ egress to Birches Close off Cricket Green. It is noted within the existing allocation (ref) that the site has restricted access, although this did not impact on the principle of residential development and subsequent allocation. Furthermore, access and highways was not identified as a reason for refusal in the 2010 application.

Residential layout plans are being developed which accord with local parking standards.

It is therefore considered that the site could accommodate residential development, via current access and egress arrangements.

Flood Risk and Drainage

Birches Close is within an area of critical drainage. At an appropriate time, engineers will be appointed to prepare a Flood Risk Assessment and advise on measure to minimise surface run-off and maximise the use of SuDS, having regard to Policy CS16 (Flood Risk Management) of the 2011 Core Strategy, and Policy DM F1 (Support for Flood Risk Management) and Policy DM F2 (Sustainable Urban Drainage Systems (SuDS) and; Wastewater and Water Infrastructure) of the 2014 Sites and Policies Plan and Policies Map document.



Fig.8 Broad development area

Proposed developed land Existing developed land

Utilities

It is anticipated that residential development on the site will be able to connect to the existing utilities networks which currently serve the site. The presence of necessary utilities networks in the area is evident given that the site is adjacent to residential development. Further investigations and enquiries would reveal any improvement works or on-site provision deemed necessary.

Green Infrastructure

There are a number of trees onsite. As the site is within a conservation these would be afforded statutory protection.

Design proposals will aim to achieve enhancement on the current ecological value, retaining trees where possible and replacing any trees that are removed.

Heritage and Archaeology

The Birches building is locally listed and its retention is therefore required. The nearest statutory Listings are found close to the front of the site. The White House (Grade II), Chestnut Cottage (Grade II), and Elm Lodge (Grade II). The site is not located within the defined curtilage of these heritage assets and so development of the site should not compromise their setting.

The site is within Mitcham Cricket Green Conservation Area is, however woodland provides visual separation from the development site.

It is anticipated that the development of the site for residential use would not impact upon the setting or significance of these heritage assets and Conservation Area. Proposals for the redevelopment of the site would consider options for this heritage asset as part of a detailed Heritage Statement.

The site is within an Archaeological Priority Zone, although there are no previously recorded non-designated heritage assets within the boundary of the Site. An Archaeological Assessment would need to be prepared in support of any planning application.

Illustrative Masterplan

Birches Close

The site is previously developed land currently occupied by Birches Freshfields Day Centre. Existing buildings are poorly utilised and are in need of significant investment. NHSPS have been working closely with commissioners to establish the most suitable location for the delivery of a new hub in this part of the borough, and this is closely aligned to the strategic intention of the Five Year Forward View. To support the delivery of this facility on The Wilson site, Birches Close should be developed for residential uses.

NHSPS welcome the opportunity to work with the Council and the local community to bring the site forward to deliver new homes on this site which take account of local context and constraints.

In that context, review of the site and its development potential considers the proposed allocation residential development only.

An illustrative layout has been prepared for the site to underline its development potential, its positive relationship with the wider area as a basis for further discussion with the Council and the local community.

Site Constraints and Opportunities

The site is within the Mitcham Cricket Green Conservation Area and an archaeological priority zone. The Birches is locally listed and there are three listed buildings located adjacent or near to the site access/ egress to Cricket Green, including The White House (Grade II), Chestnut Cottage (Grade II), and Elm Lodge (Grade II).

The existing allocation states that if the Local Care Centre is to be located at another site then the site has potential for community uses including education (D1 Use Class), and/or a nursing home (C2 Use Class) and/or residential (C3 Use Class).

The relocation of services would therefore accord with the Council's planning policies, as well as those respective policies within the London Plan. Furthermore, redevelopment could both improve the setting of locally listed buildings and remove later additions, to create a distinctive and successful place that complements the adjoining communities.

Key opportunities offered by the site include;

- Contributing towards meeting local housing need
- Providing new, mixed tenure homes
- Improving the setting of listed and locally listed buildings
- Improving the character of the Conservation Area
- Utilising previously developed public sector land
- Promoting sustainable living through the delivery of new homes in an accessible location well served by public transport



Fig.9 Illustrative development framework

- Key**
- Proposed developed land
 - Existing developed land
 - Landscaping
 - Entrance
 - Access

Potential Development Capacity	
1,2 & 3 Bed Apartments	35-40 No.
3 Bed Townhouses	4-6 No.
Refurbished Apartments	3-5 No.

Summary and Conclusion

There is significant Government pressure on the public sector to intensify underutilised sites through co-location or consolidation of facilities and services. The site is part of a wider drive to modernise services in this part of the borough and could successfully deliver residential development, providing an opportunity to rationalise the community estate and fund new healthcare facilities.

NHSPS is fully committed to helping the Council meet its housing requirements and will therefore support the sites inclusion within the Local Plan. This will help facilitate the development and the establishment of a clear healthcare strategy in this location, providing improved health services for the local community which are sufficiently flexible to meet anticipated growth and demand.



St. Francis Public
St. Peter's

PD11723/SD/LM

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lucy.mills@montagu-evans.co.uk

3 January 2019

FutureMerton team
London Borough of Merton
Civic Centre
London Road
Morden
SM4 5DX

By Post and Email
future.merton@merton.gov.uk

Dear Sir / Madam,

**REPRESENTATIONS ON BEHALF OF NHS PROPERTY SERVICES IN RELATION TO THE BIRCHES, BIRCHES CLOSE, MITCHAM, CR4 4LQ
NEW LOCAL PLAN STAGE 2 CONSULTATION**

On behalf of our Client, NHS Property Services Ltd (NHSPS), we write to submit representations to the London Borough of Merton ("the Council") in respect of their New Local Plan Stage 2 Consultation. Representations for Wilson Hospital have been submitted under separate cover.

The Site

The Birches ("the Site") is located at Birches Close, Mitcham, Surrey, CR4 4LQ. A site location plan is attached at **Appendix 1**. 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.

There is a single point of vehicular access / egress to Birches Close off Cricket Green, and there are areas of formal surface parking across the Site providing space for circa 50 cars.

The buildings range between one and two storeys in height, and they all have brick facades and pitched roofs.

The areas around the Site are mixed in terms of land use and building typology.

To the north of the Site is an independent primary school (Date Valley School) and residential dwellings, including flatted apartments (three storey) and terraced houses (two storey).

To the east of the Site are office uses and residential institutional uses (Cumberland Care Home).

To the south is a leisure centre, which provides three artificial grass pitches, a bowling green, a church and small terrace of residential dwellings (two storey).

To the west of the Site are large detached and semi-detached residential dwellings off Cricket Green road, beyond which is the Cricket Green and a larger area of open green space. There are three listed buildings located adjacent or near to the Site access / egress to Cricket Green, including The White House (Grade II), Chestnut Cottage (Grade II), and Elm Lodge (Grade II).

There are regular TfL bus services operating along London Road (A217) and Cricket Green (A239) and Mitcham Junction National Rail station is approximately 1.25 kilometres to the south-east of the Site.

The western part of the Site is located within an area of PTAL rating 4, and the eastern part is within an area of PTAL rating 2 on the Transport for London's WebCAT mapping service. The Site an average PTAL rating 3.

The Site is within the ownership of NHSPS and is currently underutilised, with a significant amount of void space. A number of the buildings on site have suffered from dilapidation, and would require significant investment to modernise them.

Relevant Planning History

Planning application reference 10/P0153 was dismissed at appeal on 22 October 2010, alongside the corresponding applications for Conservation Area Consent and Demolition Consent (10/P0154 and 09/P1531). The proposed scheme comprised wholly residential uses:

"Retention and conversion of birches house from a healthcare centre (use class D1) to provide 4 two bedroom flats with the demolition of all other healthcare buildings (use class D1) and assisted living units and development of 6, two and three storey buildings providing 23 residential units including 4 two bedroom houses, 11 three bedroom houses, and 8 four bedroom houses with a new two storey building providing 8 replacement assisted living units with communal and support accommodation associated car & cycle parking, access & landscaping."

The application was refused on design grounds only, showing redevelopment of this site for residential uses was considered acceptable by the Inspector.

We note there are also various applications between 2006 – 2007 for minor tree-related works, all of which were approved.

NHSPS Strategy

In accordance with the representations previously submitted by the NHSPS dated January 2018 and enclosed at **Appendix 2**, the clinical and planning strategy is for a health and wellbeing campus on the Wilson Site, and this aligns with the strategic intention of the Five Year Forward View. To reiterate previous representations, the delivery of an enhanced primary care model serving the population of East Merton is supported at a national level by the General Practice Forward view, published by the NHS England on 21 April 2016, and locally within the key priorities of the South West London STP.

The Birches 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 Strategy is therefore to consolidate the services onto the Wilson Site, which will result in the Birches being surplus to operational requirements.

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

Background

The current development plan for the London Borough of Merton comprises:

- The London Plan (November 2016);
- Core Planning Strategy (July 2011); and
- Sites and Policies Plan and Policies Map (2014).

The London Borough of Merton are in the process of preparing a New Local Plan, known as the Local Plan 2020. The new Local Plan will influence how the borough develops and grows over the next 15 years, with a plan period of 2020-2035.

The London Borough of Merton undertook Stage 1 consultation between October 2017 and January 2018.

The Council are now undertaking a second round of consultation, and are currently consulting on Stage 2 of the New Local Plan. These representations have been submitted pursuant to Stage 2, and are consistent with the representations submitted by NHSPS pursuant to Stage 1.

A full copy of the previously submitted representations can be found in **Appendix 2**, and should be read alongside these representations.

Stage 2 New Local Plan – Mitcham

Draft Policy N3.2 has regards to Mitcham and sets out the Council's visions for Mitcham Town Centre and the surrounding area. Policy states that:

"To improve the overall environment of Mitcham surrounding areas by providing quality shopping, housing, community facilities and good transport links.

The council will do this by:

g. Supporting North Mitcham Local Centre: only supporting development that complements or improves the local or wider public realm;

h. Improving the quality and mix of homes including affordable and private housing;

i. Ensuring that development conserves and enhances the historic environment,

for example, around Cricket Green, Canons House and Mitcham Common;
j. Enhancing the public realm through high quality urban design and architecture, and permitting development that makes a positive visual impact to the overall surroundings and connectivity to the town centre;
k. Supporting regeneration at Pollards Hill to optimise the provision of new homes and refurbish existing homes in a landscaped setting.”

The Draft Policy is clear that a range of uses, including residential uses are supported in principle within areas surrounding Mitcham Town Centre.

NHSPS are supportive of this draft policy and this aligns with the strategic intentions for the redevelopment of the Birches Site.

Mitcham Sites – The Birches

The draft Merton Stage 2 Local Plan identifies a total of 19 sites in Mitcham for allocation and land designations.

The Birches has a draft allocation under allocation Mi2. The principle of the allocation of the site is supported by NHSPS, and this aligns with NHSPS’s wider estate strategy for the redevelopment of the Site.

The draft allocation, at a high level, sets out the potential use of the site, issues and opportunities. It is envisaged that the allocation will be refined as the New Local Plan develops through the plan making process.

The proposed use, issues and opportunities within the draft allocation, are addressed in turn, as follows.

Proposed Use

The draft allocation identifies the suggested use, based on the responses received from the Stage 1 consultation and the ‘Consultee’s Suggested Use’ section acknowledges NHSPS’s suggested use of residential.

Mitcham Cricket Green Community and Heritage have also responded and suggested and the draft allocation records that they consider office (B1a) and Community (D1) uses as being appropriate on the Site.

It is unclear what feasibility testing has been undertaken by Mitcham Cricket Green Community and Heritage, and what evidence supports the need for offices in this location. We note that the existing uses on-site are all ancillary to the health use, and through the Strategy of consolidating the health care uses on the Wilson Hospital site the Birches will become surplus to requirements.

Of note, the Mitcham Cricket Green Community and Heritage’s representation to the Merton Local Plan review dated January 2018, does also support residential (C3) use at this Site. It is unclear why this was not included within the consultees suggested use in the Stage 2 consultation document, but it is assumed that this was omitted in error and we request that this be amended.

The proposed use of the Site for residential is still supported and promoted by NHSPS. The residential use was not previously defined and it is now proposed that the allocation should be afforded greater flexibility to also allow for residential institutions (C2). Given that the Site is situated within a Conservation Area, and considering the surrounding residential/care/educational context, a C2 use is considered to be appropriate.

The proposed use as a residential institution could also assist the Council in meeting its specialist housing needs.

The allocation of the Site for C2/C3 aligns with the intention of the Estate Strategy, which seeks flexibility, to account for changes in the market demand over the fifteen year plan period (2020-35) and to ensure that the Site is brought forward. An allocation which allows for residential and/or residential institution would therefore be welcomed.

It is suggested that the proposed allocation is revised to read as follows:

“residential (C3) and / or residential institution uses (C2)”.

Delivery of the Site

The Council’s proposed site allocation is for:

“Residential, following the completion and opening of a primary healthcare facility will be provided at the Wilson Hospital site as part of the health and wellbeing campus” [our emphasis]

NHSPS support the principle of the proposed redevelopment of the Site, and wish to ensure that the Site remains allocated within the New Local Plan 2020. However, NHSPS do not support the proposed allocation as it is currently drafted. The suggested trigger point for the development of the Birches Site is not appropriate.

The Birches has been the subject of a previous application and an appeal for a residential use. None of these previous applications required or proposed to be restricted through a requirement to undertake development of a healthcare facility at the Wilson Hospital. Further, this matter has been discussed with Development Management Officers at the Council who confirmed in recent pre-application discussions that no restriction would apply to the redevelopment of The Birches.

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 of time, as development of the Wilson came forward and opened. This would neither assist NHSPS with their strategic objectives, nor the Local Planning Authority’s need to deliver housing within a five year period. Furthermore, a restrictive allocation of this type would be inconsistent with the NPPF presumption in favour of sustainable development, which states that plans should be sufficiently flexible to adapt to rapid change.

We would therefore suggest that the trigger point is removed.

Comfort that the long term health needs of the community can be met should be dealt with via planning conditions and/or s106 agreements at application stage. This approach will provide more flexibility in terms of timescales and programme in comparison to the current “*completion and opening*” trigger.

Restrictive policies could prevent or delay required investment in services. It is important to note that there are separate rigorous NHS approval processes which must be satisfied before a facility can be declared surplus to requirements, which often includes extensive public consultation on any proposed service relocations.

Issues

The draft allocation lists the identified issues with the Site. The “issues” comprise:

“The NHS own two large sites: this site (Birches Close) and The Wilson Hospital. The new primary healthcare facility must be built and operational on the Wilson Hospital site before redevelopment can progress on the Birches site, in order to ensure that primary healthcare provision is delivered in this area and that there is no loss of potential sites on which primary care facilities could be located until this happens.

This site has restricted vehicular access.

Protecting the residential amenity of the adjacent properties.

Respecting the character of this part of the Conservation Area and the setting of the adjacent listed buildings.

Investigating the potential impact of any proposed development on Archaeological heritage.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area.”

The reference to the deliverability of the Birches Site has already been discussed above, and NHSPS request further flexibility on this point, with reference to a trigger point for the delivery of Birches being removed to avoid frustrating the delivery of this Site.

Opportunities

The allocation lists three key opportunities for the Site, which are as follows:

“Opportunities arising from the site size and location for exemplary urban design complimenting the character of the area.

Opportunities to provide either healthcare or new homes.

Opportunities to improve walking and cycling links through the site between by improving the layout of buildings and spaces within the site, connecting London Road and the town centre with The Canons House and grounds. It is acknowledged and supported that there is an opportunity to provide health and wellbeing functions for the local population, and this aligns with the aspiration for a well-being centre."

We would suggest that the list of opportunities should be expanded to include reference to the opportunity of providing a care home, which will assist the Local Planning Authority in meeting its specialist housing needs.

Closing

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 of the issues raised in the representations please do not hesitate to contact myself or Lucy Mills at this office.

Yours sincerely,



**Sam Dalzell
Montagu Evans LLP
ENC.**

cc	James McGinlay	Assistant Director for Sustainable Communities, LB Merton
	Victoria Shaw	NHS Property Services Ltd
	William Everson	NHS Property Services Ltd

Appendix 1



Fig.6 Birches Close existing site plan

- Key**
- Listed building
 - Locally listed building
 - Buildings that make a positive contribution
 - Buildings that make a negative impact
 - Negative feature
 - Significant open space
 - Conservation area boundary
 - Site boundary

Appendix 2

Wilson Hospital

Cranmer Road, Merton

Development Statement

Submitted in response to London Borough of Merton
call for sites with regard to the new local plan



January 2018



Contents

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Planning Policy Context	07
A Deliverable Site	10
Illustrative Masterplan	12
Summary and Conclusion	14

Introduction

This Development Statement has been prepared by NHS Property Services Ltd (NHSPS) and should be read in conjunction with the Wilson Hospital Development Statement. It supports clinical and planning strategies across the two, which intend to consolidate and improve existing facilities in the area, whilst considering the scope for residential development on each site.

A separate submission has been prepared for each site. This submission is concerned with the promotion of the Birches as a development site.

The document describes constraints and opportunities presented by the site and an overview of the key technical considerations, demonstrating that the site is available, suitable and achievable, and therefore capable of delivering new homes to contribute towards meeting both future housing and healthcare needs in the London Borough of Merton.

Existing Situation

Both the Wilson and the Birches benefit from an existing site allocation within Merton's Sites and Polices Plan 2014. Site Proposal 20 allocates the Wilson Hospital as a mixed use development site for uses including a nursing home (C2 Use Class), residential (C3 Use Class), community and health (D1 Use Class). Whilst Site Proposal 21 allocates The Birches for a mixed use dwellings (C3 Use Class), community (D1 Use Class) and health (D1 Use Class).

It is well understood that the Council require comfort that the long-term health needs of the local community can be met, and both allocations provide for flexibility in how this can be delivered. As such, both sites have the potential for either a mixture or single development use, in accordance with their allocations. Importantly, development across the two should be healthcare led.

NHS Strategy

A health and wellbeing campus on the Wilson site is preferred and closely aligned to the strategic intention of the Five Year Forward View. The delivery of an enhanced primary care model serving the population of East Merton is supported at a national level by the General Practice Forward View, published by NHS England on 21 April 2016, but also locally within the key priorities of the South West London STP.

The alignment with these strategic intentions and priorities is further reiterated within the CCG Strategic Estates Plan, which sets out the intention to invest in the development of the healthcare estate in East Merton and specifically the establishment of a hub on the Wilson site.

Close ongoing partnership working is needed with the Local Authority to deliver the redevelopment of the Wilson site and both The Wilson Hospital and The Birches Call for Sites submissions support this approach.

The remainder of this document is structured as follows:

- Site Location and Description
- Planning History
- Planning Policy Context
- A Deliverable Site
- Illustrative Masterplan
- Summary and Conclusion.



Fig.1 Front of site



Fig.2 Site location plan

▭ Site boundary
 ▭ Mitcham Cricket Green Conservation Area

Site Location and Description

Wilson Hospital

Wilson Hospital ("the site") is located at Cranmer Road, CR4 4LD as shown in Figure 7, measures 1.81 hectares and contains a collection of buildings with a total floorspace of 5,480 sq m.

The original building, located towards the front of the site, is locally listed and dates from 1928. This building has been extended a number of times and the central part extends to the rear of the site where two further wings project from either side. The central part is linked to another 1960s building which spans the majority of the rear boundary.

To the front of the site by the main entrance there is a two storey lodge house building.

The site has two vehicular access points off Cranmer road. There is a large surface car park on the western part of the site, with further parking to the east. Open space and mature trees exist across the remainder, the largest located in the south-eastern corner with two smaller areas of kept green space to the front.

Context of the Surrounding Area

The site is located approximately 650m from Mitcham Junction railway and tram station and is 1km south of Mitcham Town Centre, which is accessed by a bus link stopping directly outside of the hospital. The site has a PTAL rating of 3 and is connected to public transport links to Central London, Wimbledon, Morden, Sutton, Clapham Junction and Croydon.

The immediate context is predominantly residential. To the east of the site is Caesars Walk, a residential street characterised by two storey post-war semi-detached and terraced dwellings. To rear of the site are Cranmer Primary School playing fields containing a newly built building which extends to 9.6m in height. To the north is Cranmer Road (A239) which also provides access to the main Wilson Hospital site. Beyond this is a large green space known as Cranmer Green which is designated as metropolitan open land.



Fig.3 Existing hospital building looking west



Fig.4 The existing Wilson Hospital building looking east



Fig.5 Caesars Walk residential buildings viewed from site



Fig.6 Cranmer Primary School viewed from site



Fig.7 Wilson Hospital existing site plan

- Key**
- Locally listed building
 - Buildings that make a positive contribution
 - ⊙ Gateway to conservation area
 - Significant open space
 - Conservation area boundary
 - Site boundary

Planning History

Wilson Hospital

Applications Relating to the Site

The key relevant applications on this site are set out below.

i. 1998 Residential Permission and 2003 Renewal Appeal

On the 5 February 1998 the Council granted planning permission (ref. 97/P0066) for a residential development on land within the site at the corner of corner of Caesars Walk and Cranmer Road. The permission approved the erection of 11 two storey 3 bedroom houses, with associated off street car parking.

We believe this permission was due to expire on 5 February 2003 and on that day NHS Executive South Thames submitted an application to renew the permission (ref. 03/P0216).

This application was not implemented and therefore has expired.

ii. 2004 Residential Permission

The Secretary of State submitted a fresh application on 23 February 2004 (ref. 04/P0355). This application also sought permission for the erection of 11 two storey 3 bedroom houses, with associated off street car parking (17 parking spaces). Access to the vehicle parking area was located opposite 11 Caesars Walk.

On the 11 May 2004 the Council granted planning permission. We understand that this permission was also not implemented and subsequently expired on the 11 May 2009.

Lawful Planning Use

Based on historic planning applications, and existing local policy, the site is considered to be in a D1 Use Class. This is confirmed in adopted Development Plan Documents which state the site's current use comprises:

“Health clinics relating to mental health, drugs and early intervention, and a GP surgery (D1 Use Class).”

Planning Policy Context

The Development Plan for the London Borough of Merton comprises:

- ***The London Plan (November 2016)***
- ***Core Planning Strategy (adopted July 2011)***
- ***Sites and Policies Plan and Policies Map (adopted July 2014)***

The Council's latest Local Development Scheme, published in September 2016, indicates that the next consultation of relevance to this site will relate to the draft Local Plan Development Plan Document. This document was scheduled to be published for its first round of public consultation in Autumn 2017.

In October 2016 the current Mayor of London, Sadiq Khan, outlined his plans and timetable to prepare and publish a new London Plan. The Draft London Plan has now been published for public consultation.

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The development of the site is therefore set within a changing policy context. Below we outline some of the relevant key existing and emerging policies.

Housing

Merton's housing policies seek to take advantage of opportunities to deliver housing, with the key objective of increasing housing supply in residential areas, through physical regeneration and effective use of space. Brownfield sites in locations with good transport connections are prioritised. The site is brownfield land with a PTAL rating of 3.

Policy CS9 sets out that Merton is required to deliver in the region of 4,800 new dwellings by 2026 (2011–2026). However, this has been superseded by the Further Alterations to the London Plan (adopted in 2015), which set a housing target for Merton of 4,107 during the period 2015 to 2025, equivalent to 411 net additional homes per annum.

Revised figures set out in the draft London Plan (2017) set an ambitious target of 65,000 new homes each year across London. Merton will have to deliver 1,328 of these p.a., which represents a 223% increase on existing annual requirements, the greatest uplift of all London boroughs. To deliver this, a presumption in favour of residential infilling, the densification of existing schemes within PTALs 3–6 or within 800m of a Tube or rail station, or a town centre, will be implemented.

Five Year Housing Supply

The London Borough of Merton has a robust five year supply identified within the 15/16 Authority Monitoring Report (AMR). Housing projected provision exceeds both the annual target and the additional 5% buffer for the next 7 years.

Planning Policy Context

Protection for Existing Health Care Uses

Policy CS11 (Infrastructure) seeks to support the provision and improvement of infrastructure. Part D of the policy supports the provision of improved health services, in particular those identified by Sutton and Merton Primary Care Trust and any successor commissioners.

Policy DM C1 Community facilities links to Core Planning Strategy Policy CS 11 Infrastructure and states:

Proposals for new development and improvements (including expansion) to existing community facilities, health and places of worship will be supported where all the following criteria are met:

- i. *services are co-located where possible;*
- ii. *facilities are provided in accessible locations with good links to public transport;*
- iii. *the size of the development proposed is in relation to its context; iv. appropriate access and parking facilities are provided, relative to the nature and scale of the development;*
- iv. *the proposed facilities are designed to be adaptable and suitable to accommodate a range of services; and*
- v. *the use(s) do not have an undue adverse impact on the amenities of nearby residents and businesses.*
 - a. *Any redevelopment proposals resulting in a net loss of existing community facilities will need to demonstrate that:*
 - i. *the loss would not create, or add to, a shortfall in provision for the specific community uses; and*
 - ii. *that there is no viable demand for any other community uses on the site.*

Redevelopment or change of use of sites used for health facilities should not result in inadequate provision or poor accessibility to healthcare for residents.

Car Parking

In determining the appropriate level of on-site parking at this location, regard should be given to Policy 6.13 (Parking) of the 2016 London Plan. This allows for 'up to one space per [residential] unit'.

Parking capacity for health-care uses would need to reflect operational requirements.

Planning Policy Context

Matters relating to Wilson Hospital

Key Designations

The site is within the Mitcham Cricket Green conservation area, and the hospital building is a locally listed building. The site is also located within an archaeological priority zone.

A part of the site is designated as green corridor. The Cranmer Green to the northeast of the site is designated as Metropolitan Open Land, open space, green corridor, green chain, local nature reserve and is within the Wandle Valley Regional Country Park.

The northeast portion of the site is within a critical drainage area.

Site Allocation

The Wilson Hospital Site is allocated in the Council's Sites and Policies Plan July 2014 for a mixed use development (Site Proposal 20). The allocation

identifies suitable uses including a nursing home (C2 Use Class), residential (C3 Use Class), community and health (D1 Use Class).

If the Local Care Centre is to be located at another site then the Council consider that the site has potential for community uses including education (D1 Use Class), and/or a nursing home (C2 Use Class), and/or residential (C3 Use Class).

It's considered the sites size and location gives it potential for a range of uses. If the Local Care Centre is to be located on this site then a healthcare (D1 Use Class) led mixed use scheme that may include some 'residential institution' type accommodation (C2 Use Class) and/or some residential (C3 Use Class) would be acceptable.

If the Local Care Centre is to be located at another site then the Council consider that the site has potential for community uses including education (D1 Use Class), and/or a nursing home (C2 Use Class), and/or residential (C3 Use Class).

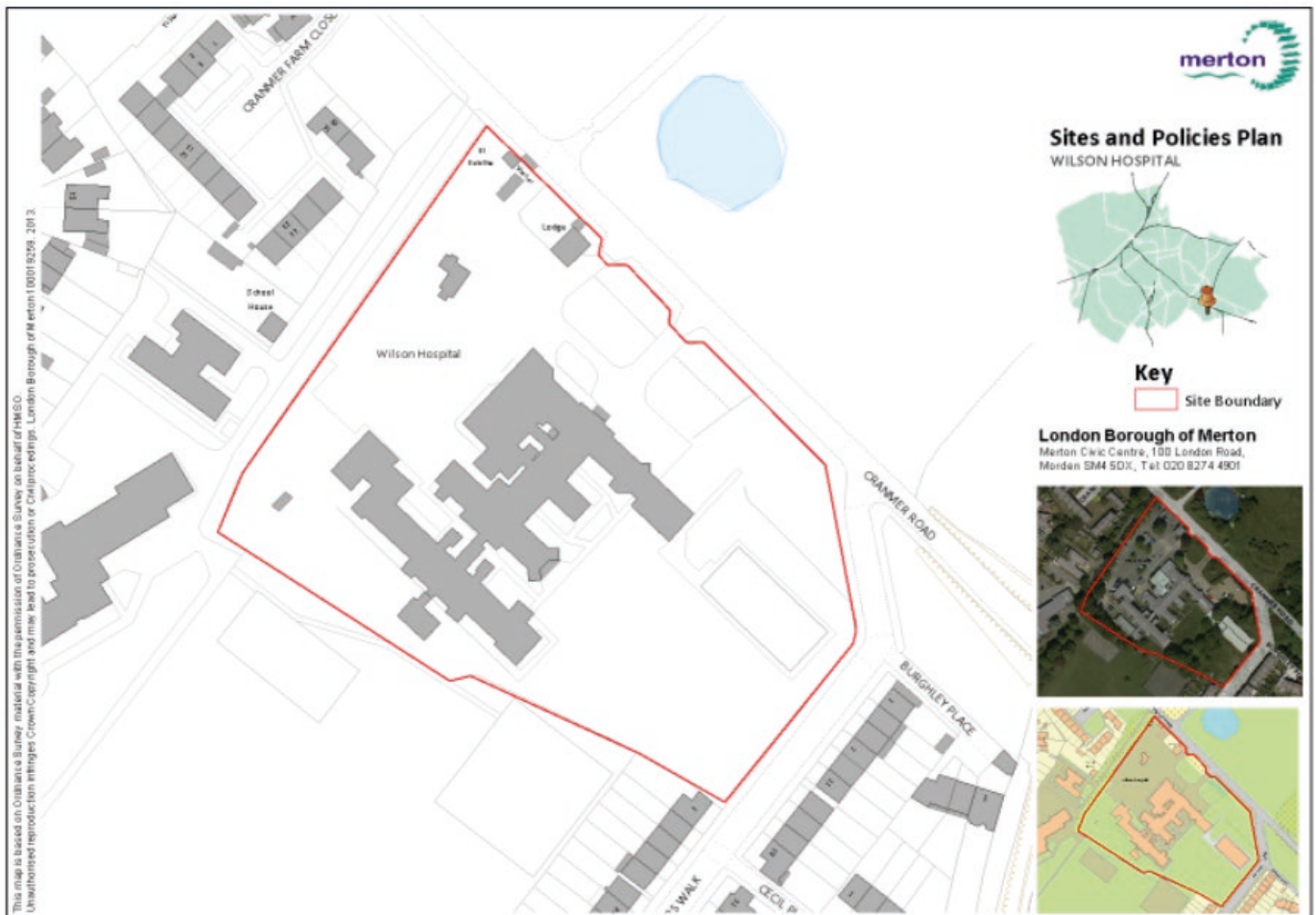


Fig.8 LB Merton Sites and Policies Plan Extract – Site Proposal 20

A Deliverable Site

Footnote 11 to Paragraph 47 of the National Planning Policy Framework confirms that to be considered deliverable, sites should be available, offer a suitable location for development, and be achievable with a realistic prospect that housing can be delivered within the next 5 years.

Available

The current Hospital is occupied by various primary care services. The site is under the ownership of NHSPS and has been identified as an underutilised site, in need of modernisation and suitable for intensification. NHSPS are exploring options for the site's redevelopment in order to secure funds for improved services onsite.

An essential element of supporting the wider transformation of NHS services and the Health Estate is to ensure NHS sites are not strategically or specifically constrained by local planning policies.

A redevelopment could deliver a hub facility, co-locating and consolidating GP and other health services on site and new homes. The site is therefore available for development/delivery within the next 5 years.

Suitable

It has been demonstrated that the site is in a sustainable location, capable of supporting a mix of residential/healthcare uses. The suitability of the site for residential use is further confirmed by the existing allocation, which identifies suitable uses including residential (C3 Use Class), community and health (D1 Use Class). With the introduction of other uses on the site, we believe the proposals offer the ability to provide a high quality and inclusive residential development, contributing towards housing land supply, whilst responding to local healthcare demands.

Achievable

NHSPS have been working with commissioners and architects to design a scheme which has considered both commissioning strategies and the physical characteristics of the site, along with other technical factors. It is confirmed that development of the site is achievable. NHSPS are confident that the site could be developed for residential development, with a layout appropriate to its setting and healthcare requirements. The following provides a summary of the technical considerations associated with development of the site.

Access and highways

As discussed, existing vehicular access to the site is currently provided from the southern side of Cranmer Road by way of an in-out access arrangement. Car parking is situated on-site on both eastern and western sides of the building and at its frontage. Pedestrian access is also from Cranmer Rd.

It is thought existing accesses could be retained, albeit changed to accommodate two-way movements at each of the access points. The north-western access could provide access and egress for the new NHS facility on site, whilst the south-eastern access could be retained for the residential use. Visibility splays are achievable from the existing egress (north-western access point) in both directions from a set-back distance of 2.4 metres. Suitable visibility splays can be achieved in both directions, including up to the mini-roundabout junction to the west of the access.



Fig.9 Broad development area

■ Proposed developed land
 ■ Existing developed land
 ■ Green Corridor

Flood Risk and Drainage

The site is within an area with critical drainage. At an appropriate time, engineers should be appointed to prepare a Flood Risk Assessment and advise on measure to minimise surface run-off and the use of SuDS, having regard to Policy CS16 (Flood Risk Management) of the 2011 Core Strategy, and Policy DM F1 (Support for Flood Risk Management) and Policy DM F2 (Sustainable Urban Drainage Systems (SuDS) and; Wastewater and Water Infrastructure) of the 2014 Sites and Policies Plan and Polices Map document.

Utilities

It is anticipated that residential development on the site will be able to connect to the existing utilities networks which currently serve the site. The presence of necessary utilities networks in the area is evident given that the site is adjacent to residential development. Further investigations and enquiries would reveal any improvement works or on-site provision deemed necessary.

Green Infrastructure

There are a number of trees onsite. Moreover, the site is within a conservation and therefore the trees are afforded protection.

Design proposals will aim to achieve enhancement on the current ecological value, retaining trees where possible and replacing those trees being removed.

Heritage and Archaeology

The site is within Mitcham Cricket Green Conservation Area, where it is identified as an attractive local landmark. As the hospital building is locally listed its positive features should be retained and enhanced where possible.

It is anticipated that the introduction of residential uses could improve upon the setting or significance of the locally listed buildings and Conservation Area. Proposals for the redevelopment of the site would consider options for this heritage asset as part of a detailed Heritage Statement.

The site is within an Archaeological Priority Zone. An Archaeological Assessment would need to be prepared in support of any planning application.

Illustrative Masterplan

The Wilson

The site is previously developed land currently occupied by the Wilson Hospital, with good potential for redevelopment. Given that the site benefits from an existing allocation for a D1, C2 and C3 or mixed use development, the general principle of residential development on the site is already accepted.

NHSPS have been working closely with commissioners to establish the most suitable location for the delivery of a new hub in this part of the borough, and this is closely aligned to the strategic intention of the Five Year Forward View. NHSPS also welcome the opportunity to work with the Council and the local community to bring the site forward to deliver a new NHS facility and new homes in this part of the borough.

In that context, review of the site and its development potential considers and promotes the allocation for mixed use development.

An illustrative layout has been prepared for the site to underline its development potential and positive relationship with the wider area, as a basis for further discussion with the Council and the local community.

Site Constraints and Opportunities

The provision of a mix of uses on this site, including healthcare and residential complies with relevant Council planning policies, as well as those respective policies within the London Plan.

The site is within the Mitcham Cricket Green conservation area and an archaeological priority zone. The hospital building is locally listed, but has suffered from the addition of utilitarian accretions over many years and redevelopment provides an opportunity to remove unsightly buildings, deliver new housing, associated parking and open spaces that enhance the heritage asset and create a distinctive and successful place that complements the adjoining communities.

The wider context is a mix of housing types offering significant scope for a varied design approach on the site, whilst still contributing to local character of the conservation area.

Key opportunities offered by the site include;

- Providing a new, fit for purpose and flexible healthcare facility
- Contributing towards meeting local housing need
- Providing new, mixed tenure homes
- Improving the setting of a locally listed building
- Improving the character of the Conservation Area
- Utilising previously developed public sector land
- Promoting sustainable living through the delivery of new homes in an accessible location well served by public transport.



Fig.10 Illustrative development framework

- Key**
- Proposed developed land
 - Existing developed land
 - Green corridor
 - Entrance
 - Access

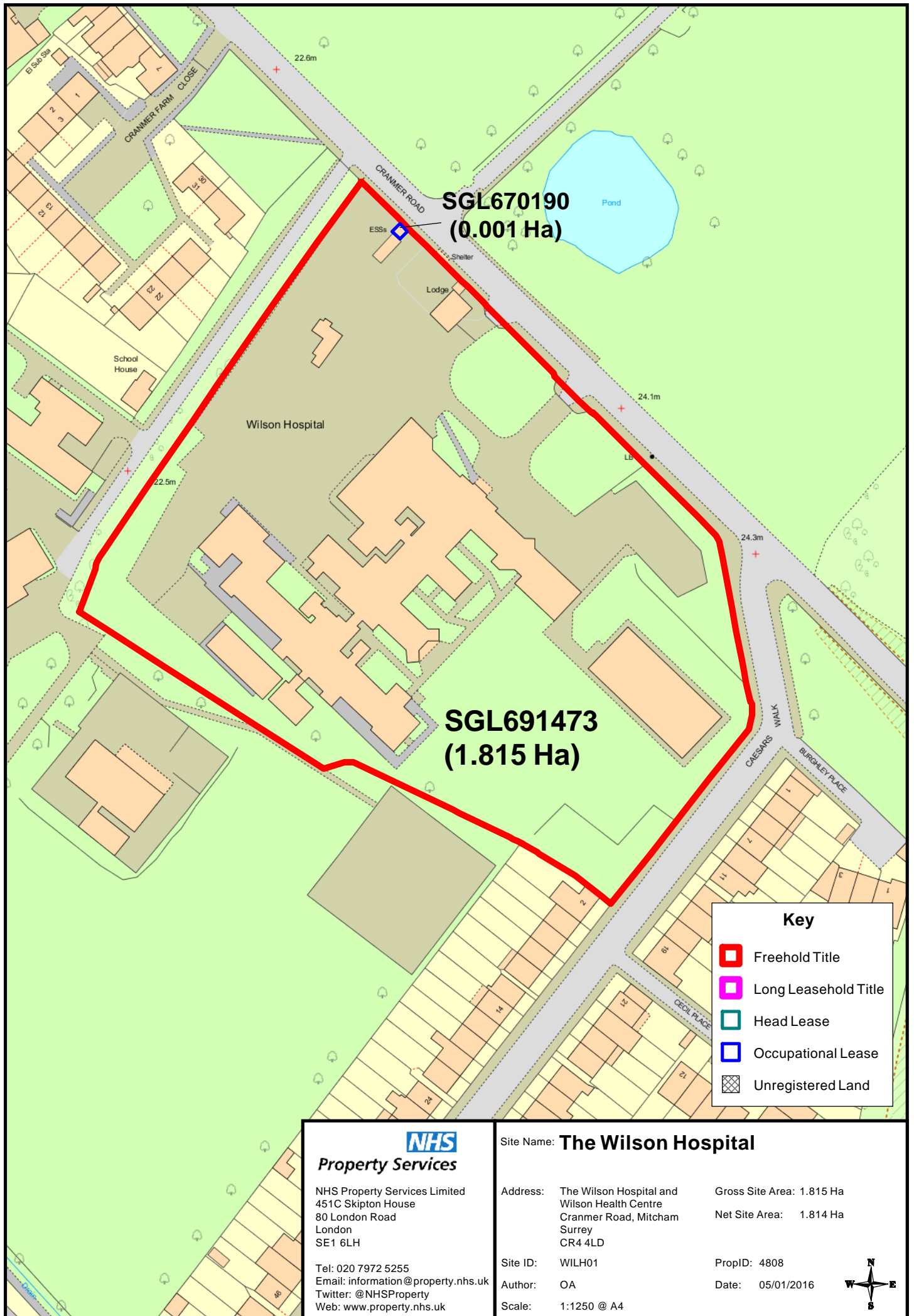
Potential Development Capacity	
1,2 & 3 Bed Apartments	15–20 No.
3 Bed Townhouses	10 No.
Refurbished Apartments	6–9 No.

Summary and Conclusion

There is significant Government pressure on the public sector to intensify underutilised sites through co-location or consolidation of facilities and services. The site is part of a wider drive to modernise services in this part of the borough and could successfully deliver a new Local Care Centre and residential development, providing an opportunity to rationalise the community estate and fund new healthcare facilities.

NHSPS is fully committed to helping the Council meet its housing requirements and will therefore support the sites inclusion within the Local Plan. This will help facilitate the development and the establishment of a clear healthcare strategy in this location, providing improved health services for the local community which are sufficiently flexible to meet anticipated growth and demand.





**SGL670190
(0.001 Ha)**

**SGL691473
(1.815 Ha)**

Key

- Freehold Title
- Long Leasehold Title
- Head Lease
- Occupational Lease
- Unregistered Land

NHS
Property Services

NHS Property Services Limited
451C Skipton House
80 London Road
London
SE1 6LH

Tel: 020 7972 5255
Email: information@property.nhs.uk
Twitter: @NHSPROPERTY
Web: www.property.nhs.uk


Site Name: **The Wilson Hospital**

Address: The Wilson Hospital and
Wilson Health Centre
Cranmer Road, Mitcham
Surrey
CR4 4LD

Site ID: WILH01
Author: OA
Scale: 1:1250 @ A4

Gross Site Area: 1.815 Ha
Net Site Area: 1.814 Ha

PropID: 4808
Date: 05/01/2016



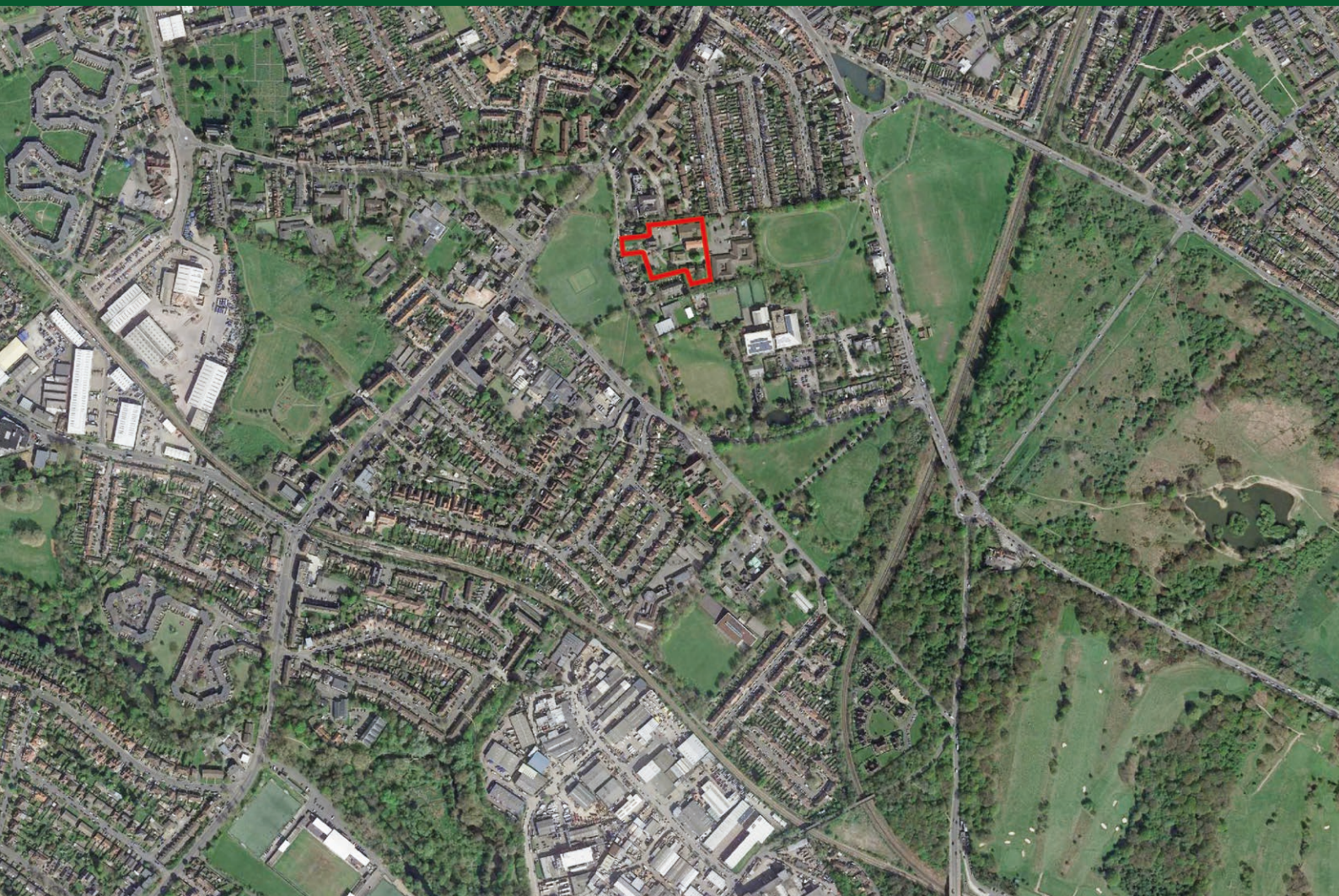
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Birches Close

Cricket Green, Merton

Development Statement

Submitted in response to London Borough of Merton
call for sites with regard to the new local plan



January 2018



St. Francis
Eye Clinic

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Fig.1 Front of site



Fig.2 Site location plan

▭ Site boundary
 ▭ Mitcham Cricket Green Conservation Area

Site Location and Description

Birches Close

Birches Close ("the site") is located at Birches Close, Mitcham, Surrey, CR4 4LQ as shown in Figure 6. The site measures 0.969 hectares and comprises a cul-de-sac with eight buildings of varying size arranged off Birches Close.

There is a single point of vehicular access / egress to Birches Close off Cricket Green, and there are areas of formal surface parking across the site providing space for circa 50 cars.

The buildings range between one and two storeys in height, and all have brick façades and pitched roofs.

Context of the Surrounding Area

The areas around the site are mixed in terms of land use and building typology.

To the north of the site is an independent primary school (Date Valley School) and residential dwellings, including flatted apartments (three storey) and terraced houses (two storey).

To the east of the site are office uses and residential institutional uses (Cumberland Care Home).

To the south is a leisure centre, which provides three artificial grass pitches, a bowling green, a church and small terrace of residential dwellings (two storey).

To the west of the site are large detached and semi-detached residential dwellings off Cricket Green road, beyond which is the Cricket Green and a larger area of open green space. There are three listed buildings located adjacent or near to the site access / egress to Cricket Green, including The White House (Grade II), Chestnut Cottage (Grade II) and Elm Lodge (Grade II).

There are regular TfL bus service operating along London Road (A217) and Cricket Green (A239) and Mitcham Junction National Rail station is approximately 1.25 kilometres to the south-east of the site.

The western part of the site is located within an area of PTAL rating 4, and the eastern part is within an area of PTAL rating 2 on the Transport for London's WebCAT mapping service. We have assumed for this report an average PTAL rating across the site of 3.



Fig.3 View of the entrance from Cricket Green



Fig.4 Existing clinical buildings to rear of site



Fig.5 View of the grade II listed buildings (No.7&9) Cricket Green



Fig.6 Birches Close existing site plan

- Key**
- Listed building
 - Locally listed building
 - Buildings that make a positive contribution
 - Buildings that make a negative impact
 - Negative feature
 - Significant open space
 - Conservation area boundary
 - Site boundary

Planning History

Birches Close

Applications Relating to the Site

i. 2010 Appeal Scheme A and B

On the 22 October 2010 four planning appeals made by Sutton and Merton Primary Care Trust against decisions of the London Borough of Merton were dismissed. The applications were as follows:

- Appeal Scheme A (52 dwelling scheme) comprised applications for planning permission (ref. 09/P1528)
- Appeal Scheme B (35 Unit Scheme) comprised applications for planning permission (ref. 10/P0153)

The Inspector dismissed Appeal Scheme A on heritage and design grounds.

The Inspector dismissed Appeal Scheme B, which addressed the built form reason for which Appeal A was dismissed, due to the informal quality of the approach to Birches House, the appeal was dismissed.

Planning Policy Context

The Development Plan for the London Borough of Merton comprises:

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- v. *the use(s) do not have an undue adverse impact on the amenities of nearby residents and businesses.*
 - a. *Any redevelopment proposals resulting in a net loss of existing community facilities will need to demonstrate that:*
 - i. *the loss would not create, or add to, a shortfall in provision for the specific community uses; and*
 - ii. *that there is no viable demand for any other community uses on the site.*

Redevelopment or change of use of sites used for health facilities should not result in inadequate provision or poor accessibility to healthcare for residents.

Car Parking

In determining the appropriate level of on-site parking at this location, regard should be given to Policy 6.13 (Parking) of the 2016 London Plan. This allows for 'up to one space per [residential] unit'.

Parking capacity for health-care uses would need to reflect operational requirements.

Planning Policy Context

Matters relating to Birches Close

Key Designations

The Birches Close site is also within the Mitcham Cricket Green Conservation Area and an Archaeological Priority Zone and portions of the north, east and west of the site are within a Critical Drainage Area.

Site Allocation

The Birches Close site is allocated in the Council's Sites and Policies Plan July 2014 for a mixed use development (Site Proposal 21) which is very similar to the Wilson Hospital allocation. The allocation identifies suitable uses including some 'residential institution' type accommodation (C2 Use Class), residential (C3 Use Class), community and health (D1 Use Class).

As with the Wilson Hospital allocation, the Council consider that the site's size and location gives it potential for a range of community uses (D1 Use Class) in whole or in part including healthcare and education.

If the Local Care Centre is to be located on this site then a healthcare (D1 Use Class) led mixed use scheme that may include some 'residential institution' type accommodation (C2 Use Class) and/or some residential (C3 Use Class) would be acceptable.

If the Local Care Centre is to be located at another site then the Council consider that the site has potential for community uses including education (D1 Use Class), and/or a nursing home (C2 Use Class), and/or residential (C3 Use Class).

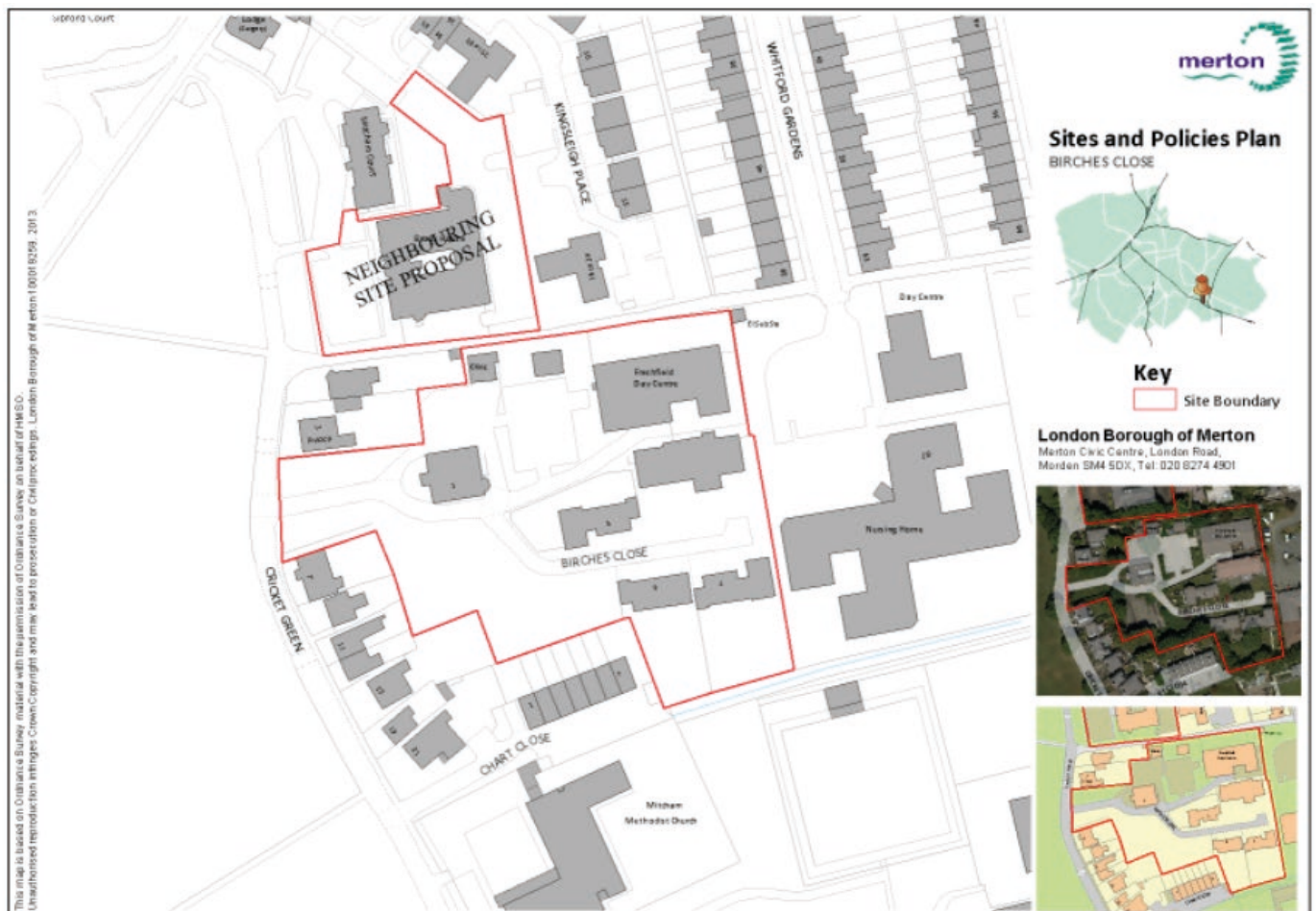


Fig.7 LB Merton Sites and Policies Plan Extract – Site Proposal 21
Birches Close, Mitcham Development Statement

A Deliverable Site

Footnote 11 to Paragraph 47 of the National Planning Policy Framework confirms that to be considered deliverable, sites should be available, offer a suitable location for development, and be achievable with a realistic prospect that housing can be delivered within the next 5 years.

Available

The site is under the ownership of NHSPS and is currently poorly utilised with significant void space. A number of buildings onsite have suffered from dilapidation and require investment to modernise them. Furthermore, the high ratio of circulation space to useful area within many of the existing buildings, together with confusing and inefficient internal layouts, renders refurbishment and adaptation impractical and poor value for money.

An essential element of supporting the wider transformation of NHS services and the Health Estate is to ensure NHS sites are not strategically or specifically constrained by local planning policies. The consolidation of services to a single hub in this part of the borough may result in The Birches becoming surplus to operational requirements.

In this regard, the site is therefore considered available for redevelopment and could deliver a new residential development within the next 5 years.

Suitable

The site is sustainably located, capable of supporting a mix of residential uses. The suitability of the site for residential use is further confirmed by the existing allocation, which identifies suitable uses including residential (C3 Use Class), community and health (D1 Use Class). We believe proposals offer the chance to provide a high quality and inclusive residential development which improve the setting of locally listed building, enhance the conservation area and contribute towards housing land supply.

Achievable

NHSPS have been working with commissioners to design a scheme which has taken into account both physical characteristics and clinical strategies of the site, along with other technical factors. It is confirmed that development of the site is achievable. NHSPS feel the site could be developed for between 45–60 dwellings, with a layout appropriate to its setting. The following provides a summary of the technical considerations associated with development of the site.

Access and highways

As discussed, there is a single point of vehicular access/ egress to Birches Close off Cricket Green. It is noted within the existing allocation (ref) that the site has restricted access, although this did not impact on the principle of residential development and subsequent allocation. Furthermore, access and highways was not identified as a reason for refusal in the 2010 application.

Residential layout plans are being developed which accord with local parking standards.

It is therefore considered that the site could accommodate residential development, via current access and egress arrangements.

Flood Risk and Drainage

Birches Close is within an area of critical drainage. At an appropriate time, engineers will be appointed to prepare a Flood Risk Assessment and advise on measure to minimise surface run-off and maximise the use of SuDS, having regard to Policy CS16 (Flood Risk Management) of the 2011 Core Strategy, and Policy DM F1 (Support for Flood Risk Management) and Policy DM F2 (Sustainable Urban Drainage Systems (SuDS) and; Wastewater and Water Infrastructure) of the 2014 Sites and Policies Plan and Policies Map document.



Fig.8 Broad development area

Proposed developed land Existing developed land

Utilities

It is anticipated that residential development on the site will be able to connect to the existing utilities networks which currently serve the site. The presence of necessary utilities networks in the area is evident given that the site is adjacent to residential development. Further investigations and enquiries would reveal any improvement works or on-site provision deemed necessary.

Green Infrastructure

There are a number of trees onsite. As the site is within a conservation these would be afforded statutory protection.

Design proposals will aim to achieve enhancement on the current ecological value, retaining trees where possible and replacing any trees that are removed.

Heritage and Archaeology

The Birches building is locally listed and its retention is therefore required. The nearest statutory Listings are found close to the front of the site. The White House (Grade II), Chestnut Cottage (Grade II), and Elm Lodge (Grade II). The site is not located within the defined curtilage of these heritage assets and so development of the site should not compromise their setting.

The site is within Mitcham Cricket Green Conservation Area is, however woodland provides visual separation from the development site.

It is anticipated that the development of the site for residential use would not impact upon the setting or significance of these heritage assets and Conservation Area. Proposals for the redevelopment of the site would consider options for this heritage asset as part of a detailed Heritage Statement.

The site is within an Archaeological Priority Zone, although there are no previously recorded non-designated heritage assets within the boundary of the Site. An Archaeological Assessment would need to be prepared in support of any planning application.

Illustrative Masterplan

Birches Close

The site is previously developed land currently occupied by Birches Freshfields Day Centre. Existing buildings are poorly utilised and are in need of significant investment. NHSPS have been working closely with commissioners to establish the most suitable location for the delivery of a new hub in this part of the borough, and this is closely aligned to the strategic intention of the Five Year Forward View. To support the delivery of this facility on The Wilson site, Birches Close should be developed for residential uses.

NHSPS welcome the opportunity to work with the Council and the local community to bring the site forward to deliver new homes on this site which take account of local context and constraints.

In that context, review of the site and its development potential considers the proposed allocation residential development only.

An illustrative layout has been prepared for the site to underline its development potential, it's positive relationship with the wider area as a basis for further discussion with the Council and the local community.

Site Constraints and Opportunities

The site is within the Mitcham Cricket Green Conservation Area and an archaeological priority zone. The Birches is locally listed and there are three listed buildings located adjacent or near to the site access/ egress to Cricket Green, including The White House (Grade II), Chestnut Cottage (Grade II), and Elm Lodge (Grade II).

The existing allocation states that if the Local Care Centre is to be located at another site then the site has potential for community uses including education (D1 Use Class), and/or a nursing home (C2 Use Class) and/or residential (C3 Use Class).

The relocation of services would therefore accord with the Council's planning policies, as well as those respective policies within the London Plan. Furthermore, redevelopment could both improve the setting of locally listed buildings and remove later additions, to create a distinctive and successful place that complements the adjoining communities.

Key opportunities offered by the site include;

- Contributing towards meeting local housing need
- Providing new, mixed tenure homes
- Improving the setting of listed and locally listed buildings
- Improving the character of the Conservation Area
- Utilising previously developed public sector land
- Promoting sustainable living through the delivery of new homes in an accessible location well served by public transport



Fig.9 Illustrative development framework

- Key**
- Proposed developed land
 - Existing developed land
 - Landscaping
 - Entrance
 - Access

Potential Development Capacity	
1,2 & 3 Bed Apartments	35-40 No.
3 Bed Townhouses	4-6 No.
Refurbished Apartments	3-5 No.

Summary and Conclusion

There is significant Government pressure on the public sector to intensify underutilised sites through co-location or consolidation of facilities and services. The site is part of a wider drive to modernise services in this part of the borough and could successfully deliver residential development, providing an opportunity to rationalise the community estate and fund new healthcare facilities.

NHSPS is fully committed to helping the Council meet its housing requirements and will therefore support the sites inclusion within the Local Plan. This will help facilitate the development and the establishment of a clear healthcare strategy in this location, providing improved health services for the local community which are sufficiently flexible to meet anticipated growth and demand.



St. Francis Public
St. Peter's Clinic

PD11723/SD/LM

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13 December 2018

FutureMerton team
London Borough of Merton
Civic Centre
London Road
Morden
SM4 5DX

By Post and Email
future.merton@merton.gov.uk

Dear Sir / Madam,

**REPRESENTATIONS ON BEHALF OF NHS PROPERTY SERVICES IN RELATION TO THE BIRCHES, BIRCHES CLOSE, MITCHAM, CR4 4LQ
NEW LOCAL PLAN STAGE 2 CONSULTATION**

On behalf of our Client, NHS Property Services Ltd (NHSPS), we write to submit representations to the London Borough of Merton ("the Council") in respect of their New Local Plan Stage 2 Consultation. Representations for Wilson Hospital have been submitted under separate cover.

The Site

The Birches ("the Site") is located at Birches Close, Mitcham, Surrey, CR4 4LQ. A site location plan is attached in **Appendix 1**. 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.

There is a single point of vehicular access / egress to Birches Close off Cricket Green, and there are areas of formal surface parking across the site providing space for circa 50 cars.

The buildings range between one and two storeys in height, and they all have brick facades and pitched roofs.

The areas around the site are mixed in terms of land use and building typology.

To the north of the site is an independent primary school (Date Valley School) and residential dwellings, including flatted apartments (three storey) and terraced houses (two storey).

To the east of the site are office uses and residential institutional uses (Cumberland Care Home).

To the south is a leisure centre, which provides three artificial grass pitches, a bowling green, a church and small terrace of residential dwellings (two storey).

To the west of the site are large detached and semi-detached residential dwellings off Cricket Green road, beyond which is the Cricket Green and a larger area of open green space. There are three listed buildings located adjacent or near to the site access / egress to Cricket Green, including The White House (Grade II), Chestnut Cottage (Grade II), and Elm Lodge (Grade II).

There are regular TfL bus services operating along London Road (A217) and Cricket Green (A239) and Mitcham Junction National Rail station is approximately 1.25 kilometres to the south-east of the site.

The western part of the site is located within an area of PTAL rating 4, and the eastern part is within an area of PTAL rating 2 on the Transport for London's WebCAT mapping service. The Site an average PTAL rating 3.

The Site is within the ownership of NHSPS and is currently underutilised, with a significant amount of void space. A number of the buildings on site have suffered from dilapidation, and would require significant investment to modernise them.

Relevant Planning History

Planning application reference 10/P0153 was dismissed at appeal on 22 October 2010, alongside the corresponding applications for Conservation Area Consent and Demolition Consent (10/P0154 and 09/P1531). The proposed scheme comprised wholly residential uses:

"Retention and conversion of birches house from a healthcare centre (use class D1) to provide 4 two bedroom flats with the demolition of all other healthcare buildings (use class D1) and assisted living units and development of 6, two and three storey buildings providing 23 residential units including 4 two bedroom houses, 11 three bedroom houses, and 8 four bedroom houses with a new two storey building providing 8 replacement assisted living units with communal and support accommodation associated car & cycle parking, access & landscaping."

The application was refused on design grounds only, with a single reason for refusal.

There are various applications between 2006 – 2007 for minor tree-related works, all of which were approved.

NHSPS Strategy

In accordance with the representations previously submitted by the NHSPS dated January 2018 and enclosed at **Appendix 2**, the clinical and planning strategy is for a health and wellbeing campus on the Wilson Site, and this aligns with the strategic intention of the Five Year Forward View. To reiterate previous representations, the delivery of an enhanced primary care model serving the population of East Merton is supported at a national

level by the General Practice Forward view, published by the NHS England on 21 April 2016, and locally within the key priorities of the South West London STP.

The Birches 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 Strategy is therefore to consolidate the services onto the Wilson Site, which will result in the Birches being surplus to operational requirements.

NHSPS have worked collaboratively with the Local Planning Authority with regards to the delivery of intentions of the CCG Strategic Estates Plan, across both the Wilson Hospital site and the Birches.

Background

The current development plan for the London Borough of Merton comprises:

- The London Plan (November 2016);
- Core Planning Strategy (July 2011); and
- Sites and Policies Plan and Policies Map (2014).

The London Borough of Merton are in the process of preparing a New Local Plan, known as the Local Plan 2020. The new Local Plan will influence how the borough develops and grows over the next 15 years, with a plan period of 2020-2035.

The London Borough of Merton undertook Stage 1 consultation between October 2017 and January 2018.

The Council are now undertaking a second round of consultation, and are currently consulting on Stage 2 of the New Local Plan. These representations have been submitted pursuant to Stage 2, and are consistent with the representations submitted by NHSPS pursuant to Stage 1.

A full copy of the previously submitted representations can be found in **Appendix 2**, and should be read alongside these representations.

Stage 2 New Local Plan – Mitcham

Draft Policy N3.2 has regards to Mitcham and sets out the Council's visions for Mitcham Town Centre and the surrounding area. Policy states that:

"To improve the overall environment of Mitcham surrounding areas by providing quality shopping, housing, community facilities and good transport links.

The council will do this by:

g. Supporting North Mitcham Local Centre: only supporting development that complements or improves the local or wider public realm;

- h. Improving the quality and mix of homes including affordable and private housing;*
- i. Ensuring that development conserves and enhances the historic environment, for example, around Cricket Green, Canons House and Mitcham Common;*
- j. Enhancing the public realm through high quality urban design and architecture, and permitting development that makes a positive visual impact to the overall surroundings and connectivity to the town centre;*
- k. Supporting regeneration at Pollards Hill to optimise the provision of new homes and refurbish existing homes in a landscaped setting."*

The Draft Policy is clear that a range of uses, including residential uses are supported in principle within areas surrounding Mitcham Town Centre.

NHSPS are supportive of this draft policy and this aligns with the strategic intentions for the redevelopment of the Birches Site.

Mitcham Sites – The Birches

The draft Merton Stage 2 Local Plan identifies a total of 19 sites in Mitcham for allocation and land designations.

The Birches has a draft allocation under allocation Mi2. The principle of the allocation of the site is supported by NHSPS, and this aligns with NHSPS's wider estate strategy for the redevelopment of the Site.

The draft allocation, at a high level, sets out the potential use of the site, issues and opportunities. It is envisaged that the allocation will be refined as the New Local Plan develops through the plan making process.

The proposed use, issues and opportunities within the draft allocation, are addressed in turn, as follows.

Proposed Use

The draft allocation identifies the consultees suggested use, based on the responses received from the Stage 1 consultation and the 'Consultee's Suggested Use' section acknowledges NHSPS's suggested use of residential.

Mitcham Cricket Green Community and Heritage have also responded and suggested and the draft allocation records that they consider office (B1a) and Community (D1) uses as being appropriate on the site.

It is unclear what feasibility testing has been undertaken by Mitcham Cricket Green Community and Heritage, and what evidence supports the need for offices in this location. We note that the existing uses on-site are all ancillary to the health use, and through the Strategy of consolidating the health care uses on the Wilson Hospital site the Birches will become surplus to requirements.

Of note, the Mitcham Cricket Green Community and Heritage's representation to the Merton Local Plan review dated January 2018, does also support residential (C3) use at this Site. It is unclear why this was not included within the consultees suggested use in the Stage 2 consultation document, but it is assumed that this was omitted in error and we request that this be amended.

The proposed use of the site for residential is still supported and promoted by NHSPS. The residential use was not previously defined and it is now proposed that the allocation should be afforded greater flexibility to also allow for residential institutions (C2). Given that the Site is situated within a Conservation Area, and considering the surrounding residential/care/educational context, a C2 use is considered to be appropriate..

The proposed use as a residential institution could also assist the Council in meeting its specialist housing needs.

The allocation of the site for C2/C3 aligns with the intention of the Estate Strategy, which seeks flexibility, to account for changes in the market demand over the fifteen year plan period (2020-35) and to ensure that the Site is brought forward. An allocation which allows for residential and/or residential institution would therefore be welcomed.

It is suggested that the proposed allocation is revised to read as follows:

"residential (C3) and / or residential institution uses (C2)".

Delivery of the Site

The Council's proposed site allocation is for:

"Residential, following the completion and opening of a primary healthcare facility will be provided at the Wilson Hospital site as part of the health and wellbeing campus"

[our emphasis]

NHSPS support the principle of the proposed redevelopment of the Site, and seek to ensure that the Site remains allocated within the New Local Plan 2020. However, NHSPS do not support this proposed allocation as it currently reads. The suggested allocation proposes a trigger point for the development of the Birches Site. It is proposed that residential development will be acceptable in principle, only after the completion and opening of a primary healthcare facility at the Wilson Site.

The Birches has been the subject of a previous application and an appeal for a residential use. None of these previous applications were required or proposed to be restricted through a requirement to undertake development of a healthcare facility at the Wilson Hospital. Further, this matter has been discussed with Development Management Officers at the Council who confirmed that no restriction would apply to the redevelopment of The Birches.

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 accommodated on the Wilson Hospital site. Under this proposed policy the site would lie dormant, with no development coming forward for a considerable period of time, while development of the Wilson came forward and opened. This would neither assist NHSPS with their strategic objectives, nor the Local Planning Authority's need to deliver housing within a five year period. Furthermore, a restrictive allocation of this type would be inconsistent with the NPPF presumption in favour of sustainable development, which states that plans should be sufficiently flexible to adapt to rapid change.

Issues

The draft allocation lists the identified issues with the Site. The "issues" comprise:

"The NHS own two large sites: this site (Birches Close) and The Wilson Hospital. The new primary healthcare facility must be built and operational on the Wilson Hospital site before redevelopment can progress on the Birches site, in order to ensure that primary healthcare provision is delivered in this area and that there is no loss of potential sites on which primary care facilities could be located until this happens.

This site has restricted vehicular access.

Protecting the residential amenity of the adjacent properties.

Respecting the character of this part of the Conservation Area and the setting of the adjacent listed buildings.

Investigating the potential impact of any proposed development on Archaeological heritage.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area."

The reference to the deliverability of the Birches site has already been discussed above, and NHSPS request further flexibility on this point, with reference to a trigger point for the delivery of Birches being removed to avoid frustrating the delivery of this site.

The remaining issues listed above are acknowledged by the NHSPS and are were identified by NHSPS within the previous representations on pages 31 and 32.

Opportunities

The allocation lists three key opportunities for the site, which are as follows:

"Opportunities arising from the site size and location for exemplary urban design complimenting the character of the area.

Opportunities to provide either healthcare or new homes.

Opportunities to improve walking and cycling links through the site between by improving the layout of buildings and spaces within the site, connecting London Road and the town centre with The Canons House and grounds. It is acknowledged and supported that there is an opportunity to provide health and wellbeing functions for the local population, and this aligns with the aspiration for a well-being centre."

We would suggest that the list of opportunities should be expanded to include reference to the opportunity of providing a care home, which will assist the Local Planning Authority in meeting its specialist housing needs.

Closing

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 of the issues raised in the representations please do not hesitate to contact myself or Lucy Mills at this office.

Yours sincerely,



Sam Dalzell
Montagu Evans LLP
ENC.

cc	James McGinlay	Assistant Director for Sustainable Communities, LB Merton
	Victoria Shaw	NHS Property Services Ltd
	William Everson	NHS Property Services Ltd

PD11723/SD/LM

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13 December 2018

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Dear Sir / Madam,

**REPRESENTATIONS ON BEHALF OF NHS PROPERTY SERVICES IN RELATION TO THE WILSON HOSPITAL,
CRANMER RD, LONDON CR4 4LD
NEW LOCAL PLAN STAGE 2 CONSULTATION**

On behalf of our Client, NHS Property Services Ltd (NHSPS), we write to submit representations to the London Borough of Merton ("the Council") in respect of their New Local Plan Stage 2 Consultation. Representations for The Birches have been submitted under separate cover.

The Site

The Wilson Hospital ("the site") is located at Cranmer Road, CR4 4LD. The site measures 1.81 hectares and contains a collection of permanent and temporary buildings with a total floorspace of 5,480 sq m. A site location plan can be found in **Appendix 1**.

The original building, located towards the front of the site, is locally listed and dates from 1928. This building has been extended a number of times and the central part extends to the rear of the site where two further wings project from either side. The central part is linked attached to another 1960s building which spans the majority of the rear boundary.

There is a large 1960s extension to the western side of the building, situated between the front and rear wings. To the front of the site by the main entrance there is a two storey lodge house building.

The remainder of the site is occupied by temporary structures, the most notable of which is located in the north east corner as a standalone temporary unit measuring 511 sq m.

The site has two vehicular access points off Cranmer road. There is a large surface car park on the western part of the site, with further parking to the east. There is a significant amount of green space and mature trees throughout, the largest being the south eastern corner and two smaller areas of kept green space to the front of the site.

The site is located approximately 650m from Mitcham Junction railway and tram station and is 1km south of Mitcham Town Centre, which is accessed by a bus link stopping directly outside of the hospital. The site has a PTAL rating of 3 and is connected to public transport links to Central London, Wimbledon, Morden, Sutton, Clapham Junction and Croydon.

The immediate context is predominantly residential. To the east of the site is Caesars Walk, a residential street characterised by two storey post-war semi-detached and terraced dwellings. To rear of the site are Cranmer Primary School playing fields containing a newly built building which extends to 9.6m in height. To the north is Cranmer Road (A239) which also provides access to the main Wilson Hospital site. Beyond this is a large green space known as Cranmer Green which is designated as metropolitan open land, open space, green corridor, green chain, local nature reserve and is within the Wandle Valley Regional Country Park.

Relevant Planning History

On the 5 February 1998 the Council granted planning permission (ref. 97/P0066) for a residential development on land within the site at the corner of corner of Caesars Walk and Cranmer Road. The permission approved the erection of 11 two storey 3 bedroom houses, with associated off street car parking.

In 2003 an application was made to renew this permission, which was subsequently withdrawn. We therefore consider that this application was not implemented and therefore has expired.

In 2004 the Secretary of State submitted a fresh application (ref. 04/P0355), which sought permission for the erection of 11 two storey 3 bedroom houses, with associated off street car parking (17 parking spaces). Access to the vehicle parking area was located opposite 11 Caesars Walk. On the 11 May 2004 the Council granted planning permission. We understand that his permission expired on the 11 May 2009.

A number of other planning applications have been submitted on site for minor matters relation to estate management matters.

The most recent relates to the temporary siting of a single storey building and car park at the Caesars Walk and Cranmer Road corner to provide temporary health care facilities (Class D1) with associated ancillary facilities, access and parking. This application (ref. 09/P0742) was granted planning permission on 28 May 2009 and extended in 2014.

Based on historic planning applications and existing local policy, the lawful use of the site is considered to be in a D1 Use Class. This is confirmed in adopted Development Plan Documents which state the site's current use comprises:

"Health clinics relating to mental health, drugs and early intervention, and a GP surgery (D1 Use Class)."

NHSPS Strategy

In accordance with the representations previously submitted by NHSPS dated January 2018 and enclosed at **Appendix 2**, the clinical and planning strategy is for a health and wellbeing campus on the Wilson Site, and this aligns with the strategic intention of the Five Year Forward View. To reiterate previous representations, the delivery of an enhanced primary care model serving the population of East Merton is supported at a national level by the General Practice Forward view, published by the NHS England on 21 April 2016, and locally within the key priorities of the South West London STP.

NHSPS have worked collaboratively with the Local Planning Authority with regards to the delivery of intentions of the CCG Strategic Estates Plan, across both the Wilson Hospital site and the Birches.

Development Plan

The current development plan for the London Borough of Merton comprises:

- The London Plan (November 2016);
- Core Planning Strategy (July 2011);
- Sites and Policies Plan and Policies Map (2014).

The London Borough of Merton are in the process of preparing a New Local Plan, known as the Local Plan 2020. The new Local Plan will influence how the borough develops and grows over the next 15 years, with a plan period of 2020-2035.

The London Borough of Merton undertook Stage 1 consultation between October 2017 and January 2018.

The Council are now undertaking a second round of consultation, and are currently consulting on Stage 2 of the New Local Plan. These representations have been submitted pursuant to Stage 2, and are consistent with the representations submitted by NHSPS pursuant to Stage 1.

A full copy of the previously submitted representations can be found at **Appendix 2**, and should be read alongside these representations.

Stage 2 New Local Plan – Mitcham

Draft Policy N3.2 has regards to Mitcham and sets out the Council's visions for Mitcham Town Centre and the surrounding area. Policy states that:

"To improve the overall environment of Mitcham surrounding areas by providing quality shopping, housing, community facilities and good transport links. The council will do this by:

- g. Supporting North Mitcham Local Centre: only supporting development that complements or improves the local or wider public realm;*
- h. Improving the quality and mix of homes including affordable and private housing;*
- i. Ensuring that development conserves and enhances the historic environment, for example, round Cricket Green, Canons House and Mitcham Common;*
- j. Enhancing the public realm through high quality urban design and architecture, and permitting development that makes a positive visual impact to the overall surroundings and connectivity to the town centre;*
- k. Supporting regeneration at Pollards Hill to optimise the provision of new homes and refurbish existing homes in a landscaped setting."*

The Draft Policy is clear that a range of uses, including residential and community uses are supported in principle within areas surrounding Mitcham Town Centre.

NHSPS are supportive of this draft policy and this aligns with the strategic intentions for the redevelopment of the Wilson Site.

Mitcham Sites – Wilson Hospital

The draft Merton Stage 2 Local Plan identifies a total of 19 sites in Mitcham for allocation and land designations.

The Wilson Site has a draft allocation under reference Mi18. The principle of the allocation of the site is supported in principle by the NHSPS, providing that in addition to the re-provision of healthcare facilities there is an ability through the allocation for the potential for other uses on the Site to come forward, namely residential.

The draft allocation, at a high level, sets out the potential use of the site, issues and opportunities. It is envisaged that the allocation will be refined as the New Local Plan develops through the plan making process.

The proposed use, issues and opportunities within the draft allocation, are addressed in turn, as follows.

Proposed Use

The draft allocation identifies the consultees suggested use, based on the responses received from the Stage 1 consultation.

The 'Consultee's Suggested Use' section acknowledges the NHSPS's suggested use of healthcare and residential, which was promoted in the last representations.

Mitcham Cricket Green Community and Heritage have also responded and suggested the following use:

"Health facilities, community and residential (new housing along Caesar's Walk only as exceptional enabling development to support community wellbeing services with ring fenced funding)."[our emphasis]

The proposed use of the site for healthcare and residential is supported and promoted by NHSPS, and this ambition also aligns with the uses proposed by Mitcham Cricket Green Community and Heritage. The ambition for the site is to deliver a healthcare and wellbeing centre, which will integrate both healthcare and community uses.

The existing health use, which spans 5,480 sqm, is inefficient and underutilised. The redevelopment of the Site provides the opportunity to consolidate the health use, to create a health and wellbeing hub.

To make efficient use of brownfield land, in accordance with paragraph 117 of the NPPF, the strategy is to develop the remainder of the site for residential use. 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 on site, and would meet a demand / need.

The suggested use from the NHSPS therefore remains as a mix of uses comprising of healthcare and residential (C2 and C3), which is consistent with the existing allocation in the 2014 Sites and Policies Plan.

NHSPS object to ring fenced funding being referenced within the site allocation. The funding and financial structure goes beyond the strategic control of NHSPS. We consider that in terms of planning policy and plan making, this reference is not relevant to the land allocation, and should therefore not be referred to within the allocation itself.

The Council's proposed site allocation is "Healthcare with community and enabling residential". Reference to enabling, is particularly onerous with regards to the deliverability of the Site and programme, as it infers that healthcare and residential uses will have to be brought forward together. Further, the wording suggests that the residential use would be otherwise unacceptable, which is not justified given that the hospital is not statutorily listed, the historical planning history where a residential use was previously approved on the Site (04/P0355) and NHSPS's national funding model.

It is therefore suggested that the proposed use is revised in the next consultation to read as:

"healthcare with community and residential (C2 and / or C3)."

Issues

The draft allocation goes on to list the identified issues with the Site. The issues comprise:

"Protecting the residential amenity of the adjacent properties.

*Protecting the habitat of the protected species that have been identified on/near the site in past ten years
i.e. Common Toads, Smooth Newts and Common Frogs.*

Investigating the potential impact of any proposed development on Archaeological heritage.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area."

The above constraints were identified by the NHSPS within the previous representations on page 13. The list presents constraints, as opposed to issues, and we would suggest that for the next consultation this section is retitled as "constraints".

Constraints can affect how a site can be developed, and it is acknowledged that these will have to be considered as part of the design development of any application at the Site.

Opportunities

The allocation lists three key opportunities for the site, which are as follows:

*“Provide health and wellbeing functions for the local population.
Retention of the positive features of the Locally Listed building.
Respecting the character of this part of the Conservation Area.”*

It is acknowledged and supported that there is an opportunity to provide health and wellbeing functions for the local population.

The Site already functions as a health centre, and therefore it is suggested that an opportunity would be to deliver *“improved health and wellbeing functions for the local application”*. Furthermore, the site has suffered from the addition of utilitarian accretions and NHSPS recognises that redevelopment provides an opportunity to remove unsightly buildings, and deliver a mix of uses, positive features of the Locally Listed main hospital building.

It is acknowledged that the existing configuration of the Site is inefficient. As outlined in previous representation, there is significant Government pressure on the public sector to consolidate underutilised sites and make better use of sites, as part of a wider drive to modernise services. The consolidation of the Site provides the opportunity for an improved health care services, alongside residential uses

Of note, the list of opportunities does not refer to residential uses and mixed use development. The proposed use of the site for residential is a clear opportunity, which aligns with draft Policy N3.2, which seeks to deliver housing in Mitcham. The proposed use of the Site for residential is a considerable benefit and NHSPS is committed to helping the Council meet either its general needs, or specialist housing requirements. We suggest that residential development is therefore listed as an opportunity.

Closing

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 of the issues raised in the representations please do not hesitate to contact myself or Lucy Mills at this office.

Yours sincerely,

Montagu Evans

Sam Dalzell

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ENC.

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