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London Borough of Merton
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23 March 2012

Our Ref 08150016

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Dear Sir or Madam

**LONDON BOROUGH OF MERTON LOCAL DEVELOPMENT FRAMEWORK:
DRAFT SITES AND POLICIES DEVELOPMENT PLAN DOCUMENT**

We write on behalf of our client, Berkeley Homes (Central London) Ltd in response to Merton's Draft Sites and Policies Development Plan consultation document (SPDP).

Background

Berkeley Homes has secured planning permission for the residential redevelopment of the Former Atkinson Morley Hospital site to provide 79 new homes, together with environmental and recreational improvements on adjacent land to the south. Berkeley has also recently acquired the Wolfson Centre site on Copse Hill, a former neuro-rehabilitation Centre, and under a separate correspondence has submitted details of this site for inclusion in the Sites and Policies Document.

In the context of the recent residential planning permission on the surrounding sites and the established residential character of this part of Copse Hill, residential development of the site is the most appropriate alternative use.

Policy DMC1 – Community Facilities

Draft Policy DMC1 puts forward a strategy for the provision and retention of community facilities in the Borough. The Council states that community and social infrastructure covers a wider range of facilities including healthcare and sets this out in paragraph 19.4 of the Core Strategy and at paragraph 3.3 of the Draft Policies Document.

Part B of Policy DMC1 of the draft SPDP states that the loss of any community facilities will be resisted and sets out criteria that applicants are expected to meet, including:

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- *demonstrate that the loss would not create a shortfall in provision for the specific community use; and*
- *that there is no viable demand for any other community uses on the site.*

In addition to these requirements, the supporting text to DMC1 at paragraph 3.6 sets out further criteria which applicants who propose the loss of a community facility are expected to meet. These comprise the following;

- *the site has been marketed for 30 months, unless otherwise agreed with the council;*
- *all opportunities to re-let the site have been fully explored;*
- *the site has been marketed using both new and traditional marketing tools;*
- *the site has been marketed at a price which is considered reasonable*

In relation to health facilities, there is a further requirement at paragraph 3.8 that requires the applicant to demonstrate that the redevelopment of any sites used for health facilities does not result in inadequate provision or poor accessibility to healthcare for local residents.

In respect of healthcare facilities, Policy DMC1 and paragraphs 3.6 and 3.8 are predicated on the basis that services are best provided at the local level. While there has been an increasing trend for a range of routine services and procedures being provided at local surgeries and polyclinics, the policy fails to acknowledge that more complex treatments and procedures will be delivered through specialist centres, where centres of excellence and world class expertise will be located. The likelihood is that some of these services will be centralised.

The policy needs to be amended to recognise that the closure of services at a particular site and their re-location to another site, even if it is not in the immediate locality is a positive development if the level of expertise used in the delivery of those services increases. The closure and relocation of such services should not then provide a basis to frustrate the redevelopment of a redundant site.

As currently drafted, Policy DMC1 and the supporting text at paragraphs 3.6 and 3.8 specify six separate requirements that applicants proposing the change of use of a healthcare facility are expected to meet. This is an unduly onerous requirement and will needlessly hinder the re-development of redundant sites.

Specifically, the first bullet point of Paragraph 3.6 and the requirement of 30 months of marketing information will result in sites, which otherwise are genuinely redundant and can't be re-let for community use, being sterilised for 30 months. By the time the duration of the planning process is factored in, sites could be sterile for 3 ½ to 4 ½ years depending on the problems encountered in securing planning permission. The sterilisation of such sites, which could otherwise come forward providing homes or jobs in an area, is completely at odds with the Government's presumption in favour of sustainable development

which helps deliver economic growth. This is an overly onerous requirement which will result in a failure in such sites being brought forward for development, reducing the rate of economic growth. Paragraph 13 of the draft NPPF states that 'planning must operate to encourage economic growth and not act as an impediment. The marketing requirement should be amended to 12 months.

In respect of paragraph 3.8, the planning system has no particular expertise in being able to assess the adequacy of healthcare provision. It is the NHS that has the statutory responsibility for the provision of healthcare. Therefore if the NHS has determined through its own assessment regime that a site is redundant, there is no benefit in some other town planning assessment of essentially the same issue being required to support a planning permission the purpose of which is to gain approval of new land use. The first sentence of paragraph 3.8 should be deleted.

Our client owns a brownfield site which has the potential to provide a highly sustainable residential development in accordance with the principles of the NPPF. The NHS Trust has declared the Wolfson Centre surplus to requirements and therefore the residential redevelopment of the site will help to achieve the Borough housing targets, specifically for larger 3+ bedroom units which are required in the borough.

We would be grateful for your acknowledgement of receipt of these representations, and in the meantime, should you have any queries or wish to discuss matters further, please do not hesitate to contact me at the above address.

Yours faithfully



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**LONDON BOROUGH OF MERTON LOCAL DEVELOPMENT FRAMEWORK:
DRAFT SITES AND POLICIES DEVELOPMENT PLAN DOCUMENT**

We write on behalf of our client, Berkeley Homes (Central London) Ltd, in response to the London Borough of Merton's consultation on its Draft Sites and Policies Development Plan Document.

The Wolfson Centre site on Copse Hill, Wimbledon, was openly marketed during February 2012 by St George's Healthcare NHS Trust and successfully acquired by Berkeley. The Wolfson Centre is adjacent to Berkeley's Former Atkinson Morley Hospital, which has planning consent for residential redevelopment under planning reference 11/P0346. Following the vacation of the site by The Trust in 2003, development is due to commence on this site shortly.

Further to discussions with the Council, we submit the Wolfson Centre site for inclusion in the Sites and Policies Development Plan Document. We set out a summary of the site and its potential new use below.

Site Address

Wolfson Centre, Copse Hill, Wimbledon, London, SW20 0NQ
(Please find attached a site location plan).

Site Ownership and Agent Details

The site is within the freehold ownership of Berkeley Homes (Central London) Ltd.

The agent for the site is Mr Mathew Mainwaring, Indigo Planning, Swan Court, Worple Road, London, SW19 4JS.

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Site Description

The Wolfson Centre is situated on the southern side of Copse Hill, between the Former Atkinson Morley Hospital and the Former Nurse's Accommodation site known as the Firs. Planning permission has recently been obtained by Berkeley under reference 11/P0346 for the comprehensive residential redevelopment of these two sites to provide 79 new homes, together with environmental and recreational improvements to the MOL land to the south. Construction work is due to commence very shortly.

The Wolfson Centre site is approximately 0.67 hectares in area and comprises a single, large building which has been operated by St George's Healthcare NHS Trust as a Neuro-rehabilitation Centre.

The Trust has declared the Wolfson Centre surplus to requirements. They are temporarily relocating the services currently on site to St George's Hospital in Tooting for 18 months prior to moving to their final location at Queen Mary's Hospital in Roehampton. The Local Authority is aware of the move from the London Borough of Merton to the London Borough of Wandsworth and the Trust has provided Merton with reassurances that the residents of Merton will not be affected by this move.

A new bus turning facility and bus stop is currently being constructed by Berkeley under planning reference 11/P0050 at the front of the site.

Planning Designations

The Wolfson Centre is located within the Copse Hill Conservation Area and a designated Archaeological Priority Zone.

To the south of the site, beyond the site boundary is an area of Metropolitan Open Land (MOL) which also runs within part of the western boundary to Copse Hill. Beyond the southern boundary the land is also designated as a Site of Importance for Nature Conservation (SINC).

Copse Hill is allocated as a local distributor road.

Potential Alternative Use Of The Site

St Georges Healthcare NHS Trust has confirmed that the existing Wolfson Centre and its location is surplus the NHS requirements.

In the context of the recent residential planning permission on the surrounding sites and the established residential character of this part of Copse Hill, residential development of the site is the most appropriate alternative use.

As the Core Strategy (2011) makes clear at paragraph 18.6, Merton is in need of more homes of all types and sizes throughout the Borough with a particular need to significantly increase the supply of 3+ bedroom units, which over the period of 2004 – 2009 accounted for only 16% of housing delivery. The development of the Wolfson Centre site with larger residential units will deliver a development which fully respects the character of Copse Hill which is typified by

larger units, whilst also improving the supply of 3+ bedroom units which have suffered from a chronic undersupply in the last 10 years or so. These units will also be delivered on a brownfield site and replace an existing building of very limited design appeal with a new high quality development.

Timescales for delivery

The site is vacant and could come forward for residential development within a short time period (i.e. 2013)

Physical, ownership or marketing constraints

There are no physical, ownership or marketing constraints.

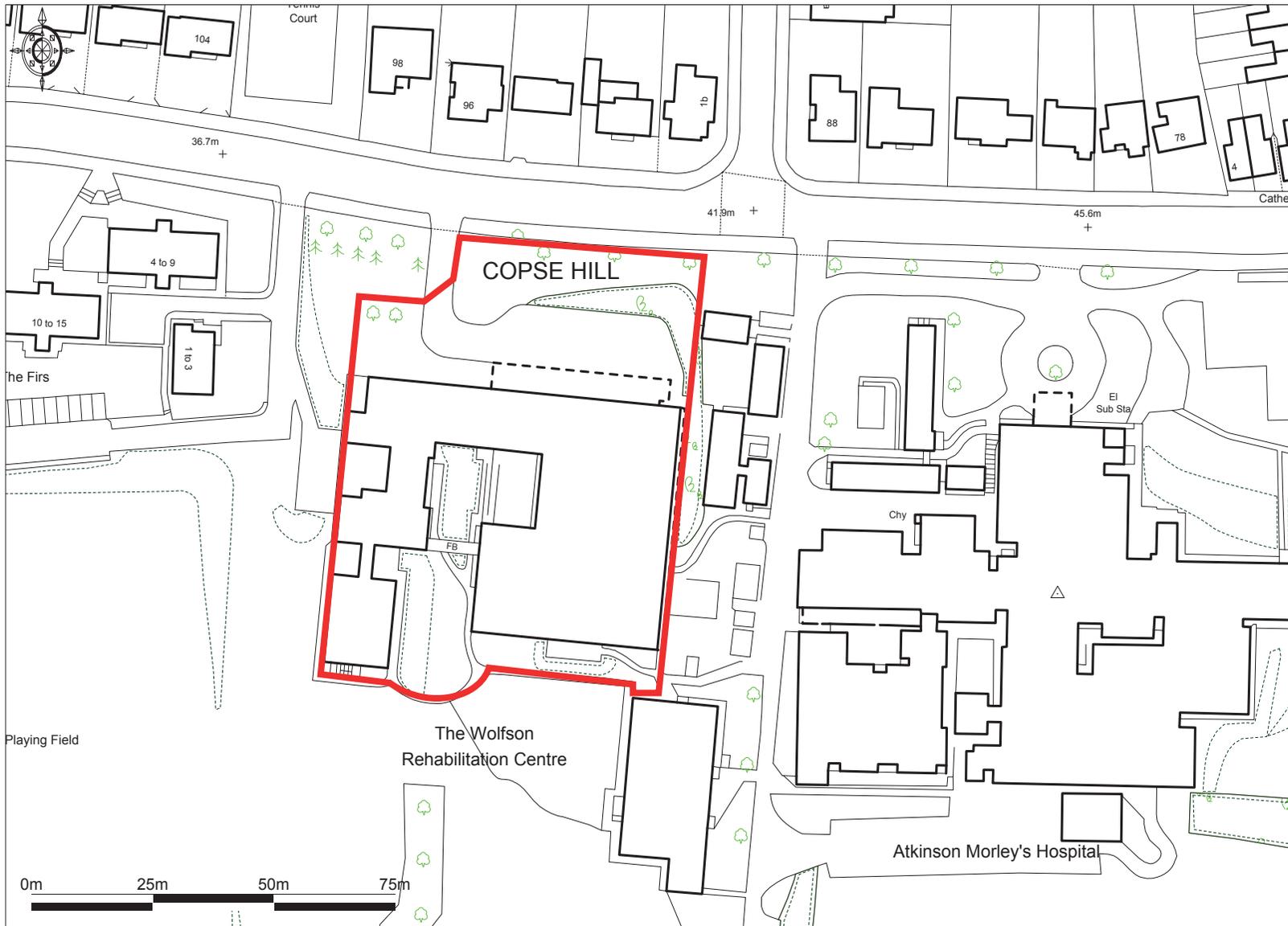
Summary

In summary, the Wolfson site is currently being vacated as part of the relocation of the existing NHS facilities to Roehampton. The site was openly marketed in February 2012 and successfully purchased by Berkeley.

The residential redevelopment of this brownfield site provides an opportunity for Berkeley to make a further contribution to Merton's housing supply with a high quality residential scheme which would complement the character of this established residential area.

We would be grateful for your acknowledgement of receipt of these representations, and in the meantime, should you have any queries or wish to discuss matters further, please do not hesitate to contact me at the above address.

Yours faithfully



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KEY  Site Boundary	Project Wolfson Centre	LPA London Borough of Merton	Indigo Planning Limited Swan Court Worple Road London SW19 4JS	
	Title Site Location Plan	Date: 15.03.12 Project No: 08150016 Drawing No: 08150016 /1	T 020 8605 9400 F 020 8605 9401 info@indigo.planning.com	
	Client Berkeley Homes (Central London) Ltd	Drawn by: DG Scale: 1:1250 		