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Your ref:

Dear Ms Glancy

London Borough of Richmond upon Thames: Local Plan Examination - Submission of written statement on site allocation SA16

On behalf of our client, the West London Mental Health NHS Trust (the Trust), we enclose a written statement to the Planning Inspector in response to the Main Issues and Questions on the London Borough of Richmond upon Thames (LBRuT) Publication Local Plan. The written statement will focus on site allocation SA16: Cassel Hospital in response to Questions 1: *“Are the Site Allocations justified by the evidence base and of sufficient detail so as to be effective in delivery?”*

By way of background, the Trust owns the Cassel Hospital site. It is currently occupied by the Cassel Specialist Personality Disorder Service (CSPD), a national service; however this uses less than half the premises. The remainder of the buildings are vacant and have been since 2011. The Trust may therefore be required to consider the future of the site which could include: the retention of the CSPD on site; the potential relocation of the CSPD off-site either in part or in full; the site being rented out either in part or in full; and/or the disposal of part or all of the site. At this point in time, no decisions have been made by the Trust in relation to the Cassel Hospital site but it is possible that a decision could be made over the lifetime of the Local Plan. As such, the Trust is keen to secure a policy position that would support and safeguard a future for the site.

Is Site Allocation SA16 sound?

The policy as drafted identifies that the *‘most appropriate use’* is social and community infrastructure. This is not supported by the Council's evidence base. The Council's Infrastructure Delivery Plan (April 2017) identifies a local demand within Ham and Petersham for sports hall and fitness centre, and a youth centre or expansion of the existing youth centre. A potential need for a new primary school site and secondary school site in the east of the borough is also identified. These uses have been explored and discounted through previous versions of the Local Plan.

This latest version of the Delivery Plan (2017) also identifies a need for sites to facilitate the relocation of health care practices to purpose built estates that are fully DDA compliant and “future proofed” for the purpose of Care Quality Commission. Ham and Petersham is not identified as a priority area. Given the sensitive context of the Cassel Hospital site and its status as a Grade II listed building, it is unlikely to provide

the facilities to meet modern demands and the flexibility required to accommodate expansion. Indeed, parts of the building are vacant and like the Trust, other healthcare providers may be discouraged from occupying a listed building due to the costs involved. For example, considerable investment would be needed to improve some of the existing vacant space to make it appropriate for health care use. In addition, whilst new purpose built accommodation could potentially be accommodated in the grounds, this is likely to be small scale and only viable as part of a comprehensive redevelopment for the site due to the costs involved in running and maintaining a listed building.

Accordingly, the site allocation is not considered sound, in terms of identifying social and community infrastructure as the most appropriate use, as it is not justified by the Council's evidence base as required by paragraph 182 of the NPPF.

In addition, the site allocation is not considered to be effective, with respect to ensuring that the site allocation is deliverable, in line with NPPF paragraph 182.

The identification of the site for community use is not considered to be viable and in turn deliverable. The Trust has previously marketed the building for lease and no credible interest was received other than for residential use. As such the current wording is considered to constrain potential future development options.

Paragraph 173 of the NPPF recognises that to ensure viability, the costs of any requirements likely to be applied to the development (which could include costs of works to listed buildings) should, when taking account of normal development costs, provide competitive returns to a willing landowner. Given the extensive nature of the works that need to be undertaken to restore the listed building and the quality that will be demanded of those works, due to its status as a listed building and its location within the Ham Common Conservation Area, residential development is considered essential to the funding of the project and a pre-requisite to achieving a viable and deliverable scheme for the site. Accordingly, we consider that in order to be effective and deliverable, in line with NPPF paragraphs 182 and 173 respectively, the site allocation wording should explicitly support residential development, rather than presenting it as an alternative use secondary to social/community use.

Overall, the site allocation wording in its current form is considered to be unsound. In response to Question 1, it is not considered that site allocation SA16 is supported by the Council's evidence base or that it will be effective in delivery as set out above.

How the site allocation can be made sound

It is considered that in order for the site allocation to be sound the wording should be amended as follows:

*"If the site is declared surplus to requirements, **residential and/or some** social and community infrastructure uses are the most appropriate land uses for this site."*

In association with this revised wording we consider that the supporting text should also be amended as follows:

*"If the site is declared surplus to requirements, in whole or part, appropriate land uses include **residential use, and/or some** social and community infrastructure uses."*

*~~"Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would A residential-led scheme **will be expected to provide** affordable housing and on-site car parking ~~be considered as a potential redevelopment option~~ **subject to robust viability evidence**"~~*

Notwithstanding our view that the evidence base does not support social and community use on this site, the Trust is agreeable for wording to accommodate some social and community use. The reference to 'some' social and community infrastructure uses would be in line with the findings from the Sustainability Appraisal (2017) which states that to mitigate the loss of the social infrastructure at the site, there should be **some** re-provision on this site, possibly in the form of community use (our emphasis added).

In addition, the proposed wording is considered to provide sufficient flexibility to establish a viable and deliverable scheme for the site in the future. This would accord with NPPF paragraph 173, which would in turn lead to an effective policy as required by NPPF paragraph 182.

Attendance at Hearing

As the owner of the site, should the Inspector see fit to include discussion on site allocation SA16 at the hearing on 28 September 2017 (morning session), we would like to participate in the examination to inform its final form.

Should you have any questions or require additional information, please do not hesitate to contact me or my colleague Victoria Barrett.

Yours sincerely



Pauline Roberts
Planning Director

Copy John Atkins – West London Mental Health Trust