

**LONDON BOROUGH OF RICHMOND UPON THAMES
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
ADDENDUM TO WRITTEN STATEMENT (LBR-LP-014)**

HEARING 4: SITE ALLOCATIONS (PART) – SA 16 only

THURSDAY 28 SEPTEMBER, MORNING

Submitted by the Council on 20 September following an additional question added to Hearing 4 by the Inspector on 18 September 2017.

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Inspector's question 10: SA 16¹ – is the allocation justified by the evidence base and will it be effective in delivery?

The Site Allocation for Cassel Hospital is justified by the evidence base and has been subject to Sustainability Appraisal (see Appendix 1).

The site is owned by the West London Mental Health NHS Trust and provides treatment for adults with severe and complex personality disorders and young people with emerging personality disorders. At this point in time, the Trust has not declared the site surplus to requirements; however, it is understood that only parts of the site are in current use with some buildings vacant. This Site Allocation takes account of the fact that the Trust has yet to make a decision on the future of the site, and that this will inform how much of the site (if any) will need to be retained for their own future needs. As such, as a decision is expected to be made within the lifetime of this Plan, this Site Allocation seeks to set out the policy position in this regard.

The policy is justified by the evidence base as there is a general need for social infrastructure and community facilities in the borough and also within the Ham and Petersham area, in line with the Council's Infrastructure Delivery Plan (IDP) (SD-021A). In relation to health facilities, the IDP's 'Figure 6: Floorspace deficiency in GP premises in the borough' shows the shortfall in GP premises floorspace, and it is evident that the existing Lock Road surgery is at an 'amber' status, which indicates a floorspace deficiency by up to 50% below target. The IDP, which has been developed and reviewed in close co-operation with key stakeholders and partner organisations, including the Richmond Clinical Commissioning Group (CCG), also identifies that the number of people with a serious mental health problem is likely to increase by 11% between 2015 and 2030, thus signalling an increase in demand for mental health provision, whereby in-patient and crisis services have been identified as a priority area. The IDP also indicates that whilst Achieving for Children (the Council's education and children services provider) will be undertaking significant investments into two 'hub centres' (none of which are located within Ham and Petersham), there will be a continued high demand for pre-school and nursery places, and that the increase in funded hours by an additional 15 hours for eligible families could see more parents wishing to access childcare services in the future. In relation to the provision of primary school places, this site has been discounted for such educational uses, in line with the Council's updated School Place Planning Strategy (SD-028). The IDP provides a snapshot in time of needs based on key infrastructure and service providers; however, it is not an exhaustive assessment of all social and community needs.

¹ Additional question added for discussion in light of submissions at the Inspector's discretion (18.9.17)

As this site is an existing social infrastructure use and as the borough is generally constrained in terms of land availability for development for non-residential uses, the Council will require other alternative social or community infrastructure uses to be fully explored, and a mix of uses, before a residential-led scheme (with affordable housing) would be considered as a potential redevelopment option. In addition, the policy acknowledges that conversion or potential redevelopment for residential uses may be needed to support the protection and restoration of the Listed Buildings, albeit this should be limited to the minimum necessary to achieve viability. This is also referred to within the main policy text as follows: "Conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the Listed Buildings."

It is therefore considered that this policy is sufficiently flexible in line with the NPPF. It allows for viability considerations and the provision of residential uses whilst also complying with Local Plan policies relating to social infrastructure. The Site Allocation does therefore not preclude the provision of residential development per se; however, relevant policies as set out in the Local Plan need to be addressed first.

The assessment and exploration of alternative social infrastructure and community uses will have to be undertaken once a decision has been made by the Trust as to how much space (if any) will need to be retained for its own services. Needs, particularly in relation to health facilities, may change over the Plan period, and the IDP will be regularly reviewed and updated. It is therefore too premature to consider that other healthcare providers would not want to occupy this site due to the costs involved in relation to the Listed Buildings. The Site Allocation is therefore considered to be effective in its implementation as well as deliverable as there is scope and flexibility for assessing the social infrastructure needs as and when the site becomes available for redevelopment. At this stage, marketing evidence in line with LP 28 and Appendix 5 of the Plan will be required in relation to alternative social infrastructure uses as part of a planning application. This is expected to look beyond the IDP, as the IDP is only a snapshot in time of needs based on key infrastructure and service providers and not an exhaustive assessment of all social and community needs. Therefore, at a planning application stage, the applicant will be expected to liaise with providers to identify whether they have updated needs, and also take account of needs arisen through other engagement methods such as part of the Council's village planning processes.

Appendix 1 – Sustainability Appraisal (SA) of SA 16 only: options and reasonable alternatives considered, including how the SA informed the Site Allocations

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
SA 16 Cassel Hospital Ham	<p>Option A: Retain status quo</p> <p>Option B: Residential (with a range of 123-332 dwellings), in response to the 'Call for Sites' consultation</p>	<p>Option A is considered to be neutral.</p> <p>Option B, other than in relation to the provision of new homes and meeting the SA housing objective, is considered to have significant negative effects, particularly in relation to parks and open spaces as well as biodiversity (as the grounds are designated OSNI and OOLTI).</p> <p>Following the assessment of options A and B above, as well as taking account of emerging evidence in relation to social infrastructure needs (particularly regarding educational needs), a further SA has been carried with 3 options:</p> <ul style="list-style-type: none"> • Option A: Retain status quo • Option B: Conversion of buildings for residential / community use (<i>note that development of the designated grounds was considered unacceptable by</i> 	<p>As a result of a review and update of the Council's School Place Planning Strategy, the SA of the options and various alternatives carried out has informed the final preferred option, as follows:</p> <p>If the site and the Grade II Listed Cassell Hospital is declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the Listed Buildings.</p> <p>The SA of the above option identified some positive as well as negative impacts, and it set out some potential mitigation measures that could be incorporated.</p>	<p>Overall, the SA informed the final option within the Plan, although other circumstances, such as the update of the School Place Planning Strategy and changes in educational needs, also determined the final Site Allocation policy. The SA carried out on the final preferred option identified some positive as well as some negative impacts but also some uncertainties, which will depend on the details of the final scheme.</p> <p>Positive impacts are related to the retention / re-provision of social and community infrastructure uses, and together with the possibility of some residential uses, this would also allow for the continued preservation of the Listed Building.</p> <p>The grounds to the rear and to the site are designated as OOLTI and OSNI, and it will</p>

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		<p><i>the plan-makers)</i></p> <ul style="list-style-type: none"> Option C: Conversion of buildings to residential and education and/or community uses <p>Overall, at that stage Option C was considered to be the most sustainable in case of the site being declared surplus to requirements, particularly as it would provide for identified educational needs in the area. However, for each option it was recognised that this is a very sensitive site with limited development opportunities and some potential for intensified uses. Any proposal for conversion would need to be sensitively designed, take account of the historic environment as well as the open land and biodiversity constraints.</p>		<p>need to be ensured that any redevelopment scheme protects these designated areas. Some potential negative impacts have been identified due to the location of the site in a poor PTAL area. It is also noted that the emerging Ham and Petersham Neighbourhood Plan may set out further guidance for the design of this site.</p>