



Local Plan Publication Consultation

From 9 June 2023 to 24 July 2023

RESPONSE FORM

The Council is inviting comments on the Publication version of the Local Plan.

The Local Plan sets out a 15-year strategic vision, objectives and the spatial strategy. The draft Plan includes place-based strategies covering the whole borough, along with accompanying site allocations, as well as the thematic planning policies that will guide future development in the borough. It will inform how growth will be accommodated across the borough. The draft Plan seeks to address future challenges including climate change, health, affordability and liveability.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes available on the website (via the link below).

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: www.richmond.gov.uk/draft_local_plan_publication_version

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to LocalPlan@richmond.gov.uk
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

Alternatively, you can make comments on the draft Local Plan **online via our Consultation Portal**, which is accessible at the website listed above.

All responses must be received by 11:59pm on Monday 24 July 2023. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

This form has two parts:

- Part A – Personal details and about you
- Part B – Your detailed response(s).

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title		Mrs
First name	Vanessa	Pauline
Last name	Lee	Roberts
Job title (where relevant)		Senior Director
Organisation (where relevant)	West London NHS Trust	Lichfields
Address		The Minster Building 21 Mincing Lane London
Postcode		EC3R 7AG
Telephone		██████████
E-mail address		pauline.roberts@lichfields.uk

*If an agent is appointed, please complete only the title, name and organisation boxes but complete the full contact details of the agent.

Data protection

The Council is committed to ensuring that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Council's Privacy Notice is published on the webpage www.richmond.gov.uk/data_protection

All responses will be held by the London Borough of Richmond upon Thames. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

If you submit comments, the consultation responses and your personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal

information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Response

3. To which part(s) of the draft Local Plan does your response relate to?

Please indicate the documents **and** the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Publication Local Plan (including changes to the Policies Map designations)	<input checked="" type="checkbox"/>	Page number(s)	119, 120 and 349
		Paragraph number(s)	Paragraph E
		Policy no./name	Policy 49
		Place-based strategy	
		Site Allocation(s) no./ name	24. Cassel Hospital
		Maps	
		Tables	
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach)	<input type="checkbox"/>		

4. Do you consider the Local Plan is:

4.1 Legally compliant	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.2 Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.3 Complies with the Duty to Co-operate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Further information on these terms is included within the accompanying guidance note, which can be found on the website at www.richmond.gov.uk/draft_local_plan_publication_version

If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.

5. Do you consider the Local Plan is unsound because it is not:

5.1 Positively Prepared	<input type="checkbox"/>
5.2 Justified	<input checked="" type="checkbox"/>
5.3 Effective	<input checked="" type="checkbox"/>
5.4 Consistent with national policy	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Under the heading 'Description of current site character' on page 119, the operator of the site should be referred to as West London NHS Trust (rather than West London Mental Health Trust). This should be amended throughout the plan where appropriate.

The West London NHS Trust (the Trust) supports the continued inclusion of Site Allocation 24 (Cassel Hospital) in the Local Plan. However, it objects to aspects of the policy.

The Trust supports recognition that the conversion or potential redevelopment for residential uses could be considered, if it allows for the protection and restoration of the listed buildings. The strategic re-use of this underutilised, previously developed site is supported by para. 119 and 120(d) of the National Planning Policy Framework (NPPF). The Trust also supports recognition that they could retain the site partially or in full and that development proposals could come forward in whole or in part.

However, Site Allocation 24 explains that if the site and hospital are declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for any development proposal. West London NHS Trust objects to this approach as, due to the complexity and costs involved in the re-use and conversion of historic buildings, alternative social and community infrastructure uses would not be viable. Nor is the approach consistent with London Plan Policy S1(G), which makes an allowance for instances where public service transformation is proposed. As such, the policy approach is not justified and is therefore unsound.

In the case of Cassel Hospital, the site is close to becoming redundant in the medium term. A very small proportion of the site continues to be occupied by the Cassel Specialist Personality Disorder Service. That service would be relocated to alternative, smaller and more modern premises elsewhere, and better suited to meeting these clinical needs. As such, the community use within the existing buildings will not be lost.

Re-use of the site for residential purposes, which is likely to include the conversion of existing listed buildings and some new build residential accommodation, is the optimal solution for the site and would help to contribute towards providing for the borough's and London's housing needs. Notwithstanding, there could be a community element as part of a residential-led, mixed use scheme, subject to demand.

Expecting the Cassel Hospital site to re-provide social or community uses is not justified and will prevent or unnecessarily delay proposals coming forward for alternative uses. Accordingly, bullet point 3, which cross-references Policy 49 'Social and Community Infrastructure' should be removed. This latter policy requires an extensive period of marketing in the case of alternative proposals for existing social and community facilities. In the case of Cassel Hospital, owing to its size, environmental and historic context, the re-use of the site and buildings for alternative social and community use is not viable and expecting the Trust to market the site for a period of 18 months will unnecessarily delay making the site available, when it should instead be focusing efforts on bringing

forward a high quality residential scheme and the re-use of redundant listed buildings, and using the funds to invest in wider public service transformation. If some marketing is deemed necessary, a reduced period of 6 months would be more appropriate and justified in this instance.

Bullet point 3 explains that marketing of the site is not required in instances where a 100% policy compliant affordable housing scheme is provided. Due to the complexity and cost associated the the re-use of the listed buldings, a 100% affordable scheme at Cassel Hospital is not justified and reference to this should be removed.

The policy explains that “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 with policy-compliant affordable housing (in line with a public sector land disposal) be considered as a potential redevelopment option.” For the above reasons, the Trust objects to the requirement for alternative social and community infrastructure but supports the approach to affordable housing being provided in line with public sector land disposals, as required by London Plan Policy H5.

The Trust questions if there is a need for the 7th bullet point which relates to heritage assets because this is captured by emerging Policy 29, London Plan Policy HC1 and the NPPF, and is unnecessary duplication.

The Trust agree with the timescales set out for the delivery of Site Allocation 24. The Cassel Specialist Personality Disorder Service continue to occupy a small proportion of the buildings. The Trust is sensitive to this position and recognise the uncertainty around if/when the site may become surplus to requirements. In this regard, the medium timeframe identified seems appropriate at this time.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 6 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

The below amendments would make the policy sound.

Bullet point 2 should read:

"Only if other alternative social or community infrastructure uses have been explored, including marketing for a period of 6 months, ~~and options discounted in line with other policies in this Plan,~~ would a residential-led scheme with policy-compliant affordable housing (in line with a public sector land disposal be considered as a potential redevelopment option."

Bullet point 3 should be removed because the complexity and cost associated with the re-use of listed buildings at Cassel Hospital cannot justify a 100% affordable housing scheme.

Bullet point 7 should be removed entirely because it repeats policies elsewhere in the Local Plan, London Plan and National Planning Policy Framework.

Please continue on a separate sheet / expand box if necessary.

8. Do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No, I do not wish to participate
In hearing session(s)

Yes, I wish to participate
In hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Yes, this is an important site in the borough and the Trust would like to explain to the Inspector the complexity and cost associated with the re-use of listed buildings and hence the content of its Reg. 19 representations.

Please continue on a separate sheet / expand box if necessary.

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.

Signature:

For electronic responses a typed signature is acceptable.

Pauline Roberts

Date:

24/07/2023