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12th January 2018

By email to: louise@poservices.co.uk

Dear Sir or Madam,

HEARING STATEMENT – NORTH HERTFORDSHIRE LOCAL PLAN (2011-2031) EXAMINATION

NHS PROPERTY SERVICES LTD (ID - 4206)

This representation is submitted by NHS Property Services Ltd (NHSPS) in relation to Land at Royston Hospital (see below and appendix 1). This follows our previous representation (4206) dated 30th November 2016 on the Regulation 19 Consultation Draft Local Plan.



These representations raise objection to elements being considered for the following matters during Hearing Weeks Five and Six.

MATTER 7 - Countryside and Green Belt: The Green Belt Review and the approach to safeguard land (Continued)

MATTER 10 - Royston

We also wish to raise objection to elements of the following matter considered during Hearing Week Three, should this be further considered during the examination process, in relation to the above.

MATTER 15 - Countryside and Green Belt: The Policy Approach to the Green Belt, Rural Areas Beyond the Green Belt and Urban Open Land

Background to NHS Property Services

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services improve the quality of care and ensure that the estate is managed sustainably and effectively.

Our Property Strategy team has been supporting Clinical Commissioning Groups and Sustainability and Transformation Plan groups to look at ways of better using the local health and public estate. This includes identifying opportunities to reconfigure the estate to better meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites emerging from this process.

Site Context

The Royston Hospital site is approximately 2.4 Ha and is on the west side of London Road (A10), on the southern edge of Royston. The hospital building currently occupies the centre of the site with a car park to the north and a grassed area to the south. The site slopes from north to south. Royston Hospital is not a Listed Building and the site is not within a Conservation Area.

The site is bound by mature trees on all sides, providing substantial screening, particularly from London Road (A10) to the east. The site falls in a predominantly residential area, with residential properties adjacent to the north and east.

The site falls less than 500m from the proposed town centre boundary of Royston, with existing vehicular access of London Road (A10)

NHSPS Objection – Matters 7, 10 and 15

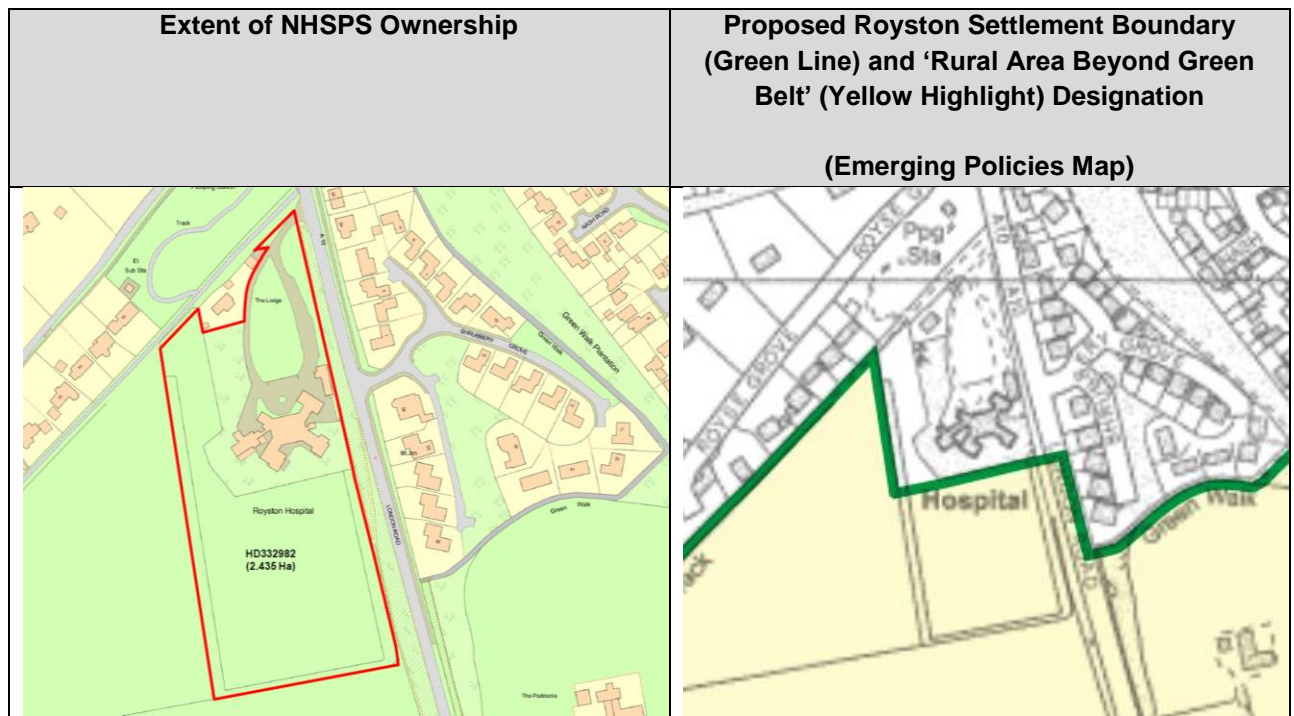
NHSPS is the freehold owner of the Royston Hospital site. By way of background, local health commissioners (Cambridgeshire & Peterborough CCG) are currently developing a strategy for the future delivery of health services in this area.

A number of options for the future of the Royston Hospital site are currently being considered, including whether the site is still required for continued health provision, as well as the potential for alternative uses on any parts of the site no longer required for the provision of health services.

The site was considered as part of the Strategic Housing Land Availability Assessment Update (2014) under Ref. R/o2 which highlighted that the site is 'suitable' for redevelopment and *"would be capable of delivering residential development if medical use of site ceased"*.

Considering the above we are therefore disappointed that the site has not been progressed as a formal site allocation within the Emerging Local Plan where the site is sustainably located, and considered suitable, available, and achievable for development within the early part of the plan period. We would encourage the Council to reconsider the site as a formal site allocation for a mix of health and residential uses (including care home) pending confirmation from health commissioners on the future delivery of health services in this area. Whatever the outcome of this process, the site is considered to have development potential within the early part of the plan period.

Notwithstanding the above, we raise strong objection to the Draft Proposals Map which excludes the southern part of Royston Hospital site from the defined Royston Settlement Boundary (Matter 10) and within the proposed 'Rural Area Beyond the Green Belt – CGB1' (Matters 7 & 15) – see below;



An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that the health estate is not constrained by local planning policies, particularly when considering options for re-providing health services and/or alternative uses (principally housing).

Faced with financial pressures, the NHS requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of part/all of unneeded or unsuitable sites and properties for best value is an important component in helping to provide funding for new or improved services and facilities.

The existing premises at Royston hospital are outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. The settlement boundary as proposed, and identification of 50% of the site within the 'Rural Area Beyond Green Belt – CGB1' is likely to prevent or delay development of the site. The policy also provides no flexibility for alternative forms of development, for example to accommodate continuing health uses on part of a site in new fit for purpose facilities, with redevelopment of the wider site for an alternative use.

No justification is provided for excluding half of the NHSPS site from the defined Settlement Boundary. The site is within single ownership, and is a clearly identifiable standalone site, directly adjoining the existing built up area. The site is heavily screened in all directions by mature trees, and is immediately adjacent to residential properties on the other side of London Road to the east. There are no known constraints that prevent development of the site within the early part of the plan period, or that justify the southern part of the Royston Hospital site being excluded from the defined Settlement Boundary.

Conclusion

For the reasons highlighted above, we raise strong objection to the proposed Royston Settlement Boundary (Matter 10), and the inclusion of part of the site within the 'Rural Area Beyond the Green Belt – Policy CGB1' (Matters 7 & 15).

We would support positive alterations (as below) to the Draft Proposals Map to ensure that the emerging Local Plan is "sound", namely that it is positively prepared, justified, effective and consistent with national policy:

- the proposals map be redrawn to include the whole of the Royston Hospital Site (as shown in appendix 1) within the defined Royston Settlement Boundary; and
- The site be removed in its entirety from the 'Rural Area Beyond Green Belt – Policy CGB1' designation

The existing premises at Royston hospital are outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. The settlement boundary as proposed, and identification of 50% of the site within the 'Rural Area Beyond Green Belt – CGB1' is likely to prevent or delay development of the site. The policy also provides no flexibility for alternative forms of development, for example to accommodate continuing health uses on part of a site in new fit for purpose facilities, with redevelopment of the wider site for an alternative use.

We would also encourage the Council to reconsider the site for formal site allocation for a mix of health and residential uses (including care home) pending confirmation from health commissioners on the future delivery of health services in this area. Whatever the outcome of this process, the site is considered to have development potential within the early part of the plan period.

NHS PS would welcome any further discussion on these matters. We look forward to receiving confirmation that these representations have been received. Should you have any queries or require any further information on the enclosed, please don't hesitate to contact me using the details below:

- Mark Adams (Senior Town Planner MRTPI)
- mark.adams@property.nhs.uk
- 07880 781262

Yours sincerely



Mark Adams
Senior Town Planner (MRTPI) – NHS Property Services Ltd

Appendix 1 – Site Location Plan (Royston Hospital)



<p>Property Services</p> <p>NHS Property Services Limited 451C Skipton House 60 London Road London SE1 6LH</p> <p>Tel: 020 7972 5255 Email: information@property.nhs.uk Twitter: @nhsiproperty Web: www.property.nhs.uk</p>	<p>Site Name: Royston Hospital</p>	
	<p>Address: Royston and District Hospital London Road Royston Hertfordshire SG8 5EN</p>	<p>Gross Site Area: 2.435 Ha Net Site Area: 2.435 Ha</p>
	<p>Site ID: ROYH01 Author: OA Scale: 1:1250 @ A3</p>	<p>PropID: 2864 Date: 16/12/2015</p>

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