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RE: 2018/5120/P 20 Rosslyn Hill

Dear David

I write on behalf of the Public Health Department which works across both Camden and Islington Councils to object to the change in planning class use from D1 Doctor's Surgery to C3 Residential.

The premises referred to is 20 Rosslyn Hill, London, NW3 1PD. This practice has 1.6 full time equivalent doctors and serves around 1,800 patients. The practice's most recent Care Quality Commission inspection report described the practice as "good".

The grounds of our objection is that such change of use would contravene Camden Council's planning policy C2g, under which the Council will ensure existing community facilities are retained recognising their benefit to the community, including protected groups, unless one of the following tests is met:

- i. a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users;
- ii. the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a community use, then our preferred alternative will be the maximum viable amount of affordable housing

The Design and Access Statement submitted with the planning application states that the current GP is now seeking to retire, however NHS Camden Clinical Commissioning Group (the CCG), which is responsible for the provision of GP services in the borough, state that this is not the case. The CCG has stated that they were unaware of the GPs plans to retire, and that six months' notice would be required to terminate the GPs contract. The CCG has subsequently clarified with the GP that she does not intend to retire and is making efforts to continue practising with her patients in the future.

Whilst the Design and Access Statement states that there are four practices in the vicinity of 20 Rosslyn Hill, no assessment of their capacity to host this GP practice or its 1,800 patients has been made. As part of the CCG's processes, a period of patient and public engagement would be required in respect of any change in GP provision, and in addition there is an established process to support vulnerable patients to seek an alternative GP.

An unplanned closure of this practice risks an increase in the inappropriate use of the Accident & Emergency department at the nearby Royal Free Hospital, placing further pressure on scarce NHS resources.

For the reasons outlined above, the Council is asked to refuse planning permission for change of use.

Yours Faithfully

Ian Sandford (sent by email)

Public Health Strategist.



Working in partnership