

Richmond Planning Department
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Tuesday 14 September 2021

Dear Sir/Madam,

Town and Country Planning Act 1990 (AS AMENDED)

RE: Construction of a single storey rear extension and change of use of existing lower ground floor flat from C3 to E(e) to enable the enlargement of the existing dental practice to provide a further 3 x surgeries.

AT: Castelnau Dentists, 200 Castelnau, London SW13 9DW

SITE AND SURROUNDINGS

The application site comprises a three-storey, mid terraced property with a basement level located on the south-eastern side of Castelnau. The subject property is not nationally or locally listed, however, is it located within the Castelnau Conservation Area. To the rear at the lower ground floor of the property there currently exists a 44sqm 1 bed flat. The access point to the residential unit is to the left of the main entrance to the dental practice on Castelnau. Beyond the entrance is a landing and stairs that lead down to the lower ground floor level flat. The rear garden area is shared between the occupiers of the flat and the users of the dental practice. There exist flats on the upper floors of the building.



RTPI

mediation of space · making of place

Members of the Royal Town Planning Institute

Registered in England 7911049 at 32 Woodstock Grove, Shepherds Bush, London W12 8LE

RELEVANT PLANNING HISTORY

- None in the public domain

PLANNING POLICY

- MHCLG's National Planning Policy Framework (2019)
 - Chapter 5 – Delivering a Sufficient Supply of Homes
 - Chapter 8 – Promoting healthy and safe communities
 - Chapter 9 – Promoting sustainable transport
 - Chapter 12 – Achieving Well-Designed Places
- GLA The London Plan (2021)
 - Policy GG3 – Creating a healthy city
 - Policy GG4 – Delivering the homes Londoners need
 - Policy H1 – Increasing Housing Supply
 - Policy D3 – Optimising site capacity through the design led approach
 - Policy HC1 – Heritage Conservation and growth
 - Policy T2 – Healthy Streets
 - Policy T4 – Assessing and mitigating transport impacts
 - Policy T5 – Cycle Parking
 - Policy T6 – Car Parking
 - Policy S1 – Developing London's Social Infrastructure
 - Policy S2 – Health and Social Care Facilities
 - Policy SD6 – Town Centres and High Streets
 - Policy SI7 – Reducing Waste and Supporting the circular economy
 - Policy SI8 – Waste Capacity and net waste self sufficiency
- LB of Richmond Upon Thames Local Plan (2018)
 - Policy LP 28 Social and community infrastructure
 - Policy LP 38 Loss of Housing

Background:

The purpose of this application is to extend the existing dental practice in order to respond to the increasing local demand for dental treatments. The existing dental practice serves NHS patients and is operating under the COVID-19 restrictions. The additional 3 surgery rooms are required to provide uninterrupted dental treatment services to the locals and meet the increasing local demand for such services. This is especially needed as the closure of the Hammersmith bridge is limiting access to any other local dental surgeries providing NHS treatment within the area. The surgery has seen a huge rise in emergencies and need since Covid and the proposed development would enable the surgery to employ 2 additional dentists to reduce the waiting times for appointments from 6 to 8 weeks.

PROPOSED DEVELOPMENT

It is proposed to convert the existing basement residential flat into three additional surgery rooms, a waiting room and hall in order to expand the lower and upper ground floor dental practice. The proposal would involve the construction of a single storey rear infill extension to enable the creation of surgery room B. The depth and height of the extension would be comparable to that of the existing rearward projection.

Assessment

Policy LP 38 (Loss of Housing) states:

- A. Existing housing should be retained.

Paragraph 9.5.4 of the supporting text states that there is a presumption against the loss of housing units but exceptions may be considered if other policy priorities are met and wider benefits provided such as an the provision of health facilities.

Policy LP 28 (social and community Infrastructure) states:

- A. The Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage.

New social and community infrastructure

- B. Proposals for new or extensions to existing social and community infrastructure will be supported where:
1. It provides for an identified need;
 2. Is of a high quality and inclusive design providing access for all; and
 3. Where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.

In light of the above, it is acknowledged that policy LP 38 indicates that there is a general presumption against the loss of housing. However, the supporting text highlights that there is an exception to this presumption where a competing policy objective is achieved and there are wider benefits such as the provision of health facilities. Upon validation of this application a supporting letter will be sent to the Council from the NHS to demonstrate the identified need for the proposal.

The proposal would increase the provision of this health facility and would serve a wider benefit, especially when considering the shortage of dental facilities within the area as a consequence of the closure of the Hammersmith bridge. The proposal would result in the expansion of the NHS dentist practice and would provide affordable dental treatments for the locals. The closest alternative surgery within the borough is 1.3 miles from the site 'Seyf Dental'. However, this is a private practice and does not offer services for NHS patients. Considering the above, it is considered that the proposal would provide a high-quality facility that provides access to all.

The application site comprises a three-storey premises, with E(e) use at ground and part of the basement levels. The residential elements of the premises are located at first and second floor levels and part of the basement level. Given the existing mixed-use nature of the premises it is considered that the building could be considered flexible and adaptable.

For the reasons considered above, the proposed development on balance would be acceptable in principle as the loss of the residential unit is outweighed by the identified need for this community facility. Although Policy LP 38 highlights the presumption against the loss of residential units, due regard should be given to the nature of the proposal. In this context there would not be a net loss of housing to the borough on a permanent basis and the residential use would begin again once this approved application becomes extant. Moreover, the loss would only relate to a single 1 person dwelling which provides a poor standard of accommodation by reason of its poor outlook, single aspect nature, poor cross ventilation and shared use of the rear amenity space with the existing E(e) premises and substandard floorspace.

Fire Safety & Heritage

The proposed minor extension and use of the premises as a dental practice will be a minor development which will have no impact on the existing fire safety measures within the property. The premises has suitable exit points and the development will not impede these. It is therefore considered that the proposal is fully compliant with Policy D12 of the London Plan.

The proposal would have no adverse impact on Heritage assets, listed/ locally listed, buildings. or conservation areas particularly given the minor nature of the proposal.

Conclusion

The proposed use would result in the loss of a small residential sub-standard flat in favour of expanding the existing dental practice in order to ensure that during the COVID-19 pandemic adequate dental treatment services could be provided to local residents. For the reasons considered above on balance the proposed development would comply with policies LP 28 and LP 38 of the LB of Richmond Upon Thames Local Plan (2018).

The LPA is respectfully requested to grant planning permission for the proposal.

Please do not hesitate to contact me should you have any further questions.

Yours sincerely,



MZA Planning