

13 January 2016



CHARTERED SURVEYORS &  
PROPERTY CONSULTANTS

Kingsbury House  
15-17 King Street  
London SW1Y 6QU

Ms Kate Phillips  
Planning Officer  
Regeneration of Planning, Culture and Environment  
London Borough of Camden  
5 Pancras Square  
c/o Town Hall  
Judd Street  
London WC1H 9JE

Dear Ms Phillips,

**Re: Planning Application, 2015/6809/P, Tavistock Mansions, 16 Tavistock Place, London WC1**

Further to our recent telephone conversation, I am writing as a Leaseholder of Flat 3 of the above building in regard to the above application. I am also representing a number of the other tenants, including flats 5, 7, 9, 10, and 12 who I have discussed this recent application with.

As you will see, we are Central London Chartered Surveyors and, as there appear to be a number of anomalies in connection with this application, we feel it important to highlight the points below as objections for consideration by the Planning Department and to ensure that these are also properly discussed. In fact as it is the Landlord Camden making a planning application through the same planning authority for commercial purposes we believe that there is a direct "conflict of interest" and this should at least be considered by the Committee (or even called in) but not delegated;. The issues are:

**1. Loss of Residential User**

This basement area, which accounts for at least 10% of additional floor space in the building, looks as though it was previously used for residential. Turning residential into commercial space we understand goes against "existing planning policy" (Meeting Housing Needs under the Council's local plan). Surely it is necessary to have evidential proof as to why the subject premises is the only location available. The application does not cover this.

The primary use is 'residential mansion block' and the addition of a further commercial unit which is not connected to the ground floor unit detracts from the natural/intended character of the original residential building.

We believe that this particular dentist carries out private cosmetic work and there are two further dentist surgeries within close proximity in Marchmont Street etc. There may not therefore be much additional benefit to the NHS as suggested.

## **2. Heritage Design and Associated External Works**

We believe that the application falls short on a number of points to do with the external works necessary in both the description of the development and the design and access statement:

- a) If the main access staircase from the pavement is to be replaced or refurbished, this will need planning permission and will be a new development in a conservation area adjoining a listed building (Design and Heritage criteria will then come into play).
- b) The same would apply to the new roof at the rear and how it is to be supported. If this is to be incorporated into the building (number 14) adjoining, there will need to be a listed building consent.
- c) There is also a concern over losing the rear passageway which has in the past been used to erect scaffolding for essential repairs to the mansion block, impacting on service costs etc.

## **3. Alienation**

The fact that this is a completely separate additional commercial unit adds to the risk of it being sub-let or assigned in the future to a separate entity, despite the restrictions mentioned.

## **4. Access Between Dentist's Floors**

It appears that to save space there is no link internally between the ground floor and basement and patients, visitors, staff etc. will be expected to take the pavement stair access from straight outside the main residential front door. This leads to the following concerns about suitability:

- a) Obstruction, particularly with patients after anaesthetic etc. exiting from a relatively tight pavement staircase.
- b) An exposed stair will become slippery, particularly considering vulnerable patients' access.
- c) Conservation area status / View from the street.
- d) Suitability as a split business premises.
- e) Risk of anti-social behaviour with loss of a gate accessing the bottom of the front stairs.

## **5. Amenity/ Health and Safety**

The council asked tenants/leaseholders to move items stored in the basement citing Health and Safety reasons. We question why the circumstances should be so different with this alternative use.

Camden are encouraging the use of bicycles in the Borough and the residents feel that the basement from the front would be better used as bike storage, thus helping reduce the demand on cars. Naturally, increasing the area in favour of medical use would increase the demand on cars, particularly for vulnerable patients and car parking is limited in the immediate vicinity.

The provision of pavement grills to help light over the pavement in Herbrand Street also highlights concerns about the addition of litter and may be a fire risk.

#### **6. Commercial Conflict**

Finally, the ground floor dentist to whom the Landlord is trying to let the basement, has until very recently been flouted planning regulation by placing banners advertising themselves on the main railings of this residential block (I believe without permission) in a conservation area. How can we be sure that further signage is not going to be placed around the main access to the basement or anywhere else?

As you will see there are a number of issues of concern highlighted above, which we feel have not been sufficiently considered. These cause the existing leaseholders and Council tenants in the residential block considerable concern. I would of course be happy to discuss the above with you individually, should you so wish, and please do not hesitate to contact me if necessary.

Yours sincerely,



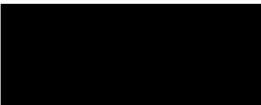
**Paul Brewster**

**Representative of Occupiers of Tavistock Mansions as signed below in agreement:**



**Martin Good**

**Leaseholder, Flat 12, 16 Tavistock Mansions London WC1**



**Jeremy Clayton**

**Leaseholder, Flat 5, 16 Tavistock Mansions London WC1**



**Clem Alford**

**Leaseholder, Flat 9, 16 Tavistock Mansions London WC1**

**Andrew Hutchings**

**Leaseholder, Flat 10, 16 Tavistock Mansions London WC1**