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Planning - Development Control  
Camden Council  
Camden Town Hall  
London  
WC1H 8ND

30 September 2016

DSP/16-281/PP-05437662  
VIA PLANNING PORTAL

Dear Sir/Madam,

**1<sup>ST</sup> FLOOR, 233 HIGH HOLBORN, LONDON, WC1V 7DN**

On behalf of our Client, The London Hair and Skin Clinic ('the Clinic'), we are instructed to submit an application for the change of use the abovementioned premises from Class B1a (Office) to a personal permission for Class D1 (Non-Residential Institution) purposes.

Accordingly, please find enclosed the following documents which comprise, in addition to this letter, the application:

- Duly completed Planning Application Form;
- Completed Certificate B and copy of Notice as served;
- Site Location Plan at 1:500 @ A4 (ref: 1536-X04 Rev A) with the site edged in red;
- First Floor Plan as Existing and Proposed (ref: 1536-P01-A);
- CIL Additional Information form;
- Marketing Statement prepared by CBRE;
- Heritage Statement (See Below);
- A cheque made payable to Camden Council for the sum of £385.00.

**a. The Site**

233 High Holborn is a six storey building with additional accommodation at basement and rooftop level, within the Central London area of Holborn.

The ground floor of the premises is occupied by 'New Look,' a clothes retailer (Class A1) and the first floor and remaining floors are currently occupied for office use (Class B1a), accessed via a dedicated entrance adjacent to New Look on the ground floor.

To the east of the site is Kingsbourne House (229-232 High Holborn), beyond which is Holborn Underground Station. Africa House is located to the south (rear of the site), separated by Gale Street, whilst to the north is the A40 (High Holborn) and to the west is 235-238 High Holborn.

The surrounding area is characterised by a mix of commercial and entertainment uses, typically with retail and restaurant uses at ground floor level with offices or residential accommodation above. Furthermore, there are also established D1 upper floor uses within close proximity to the application site, including the 'English Studio' at 113 High Holborn, an English Language School which secured full planning permission for a change of use in November 2010.

## b. Planning History

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There is an extensive online planning history for the property dating back to 1971. However, the original planning permission for the construction and use of the building is unavailable.

Notwithstanding the above, we understand that the premises was constructed in 1908 as a Bauhaus Office Building. Subsequently, the planning history of relevance is detailed below:

- LPA ref: PSX0204194 - Alterations and extensions to parts of the fourth, fifth and sixth floors and the formation of an additional floor/roof extension. As shown on drawing numbers Site plan; 939/001B to 008B inclusive; 010B; 012B; 013B; 101A to 104A inclusive; 105B to 113B inclusive; 114 and 115. Approved 01 August 2002.
- LPA ref: 2003/2473/P– Works of internal and external alteration in association with the change of use of part of the basement and ground floors from offices (Class B1) to retail use (Class A1). Approved 09 January 2004.
- LPA ref: 2006/1073/P- Renewal of planning permission dated 1st August 2002 (ref. PSX0204194) for alterations and extensions to parts of the fourth, fifth and sixth floors, and the erection of a roof extension for office (Class B1) use. Refused and appeal dismissed 28 March 2007.

The Delegated Officer's report accompanying LPA ref: 2006/1073/P states that the building comprises a retail unit at ground floor with six floors above, in office use.

There is no later planning history in relation to the use of the building. As such, we understand that the first floor of the premises continues to benefit from permission for office use (Class B1a).

Accordingly, the London Skin and Hair Clinic will require planning permission to occupy the first floor for Class D1 (Non-Residential Institution), purposes.

## c. The Application Proposal

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In light of the above, this application seeks personal planning permission for the change of use of the first floor of the premises to Class D1 (Non-Residential Institution) use.

The change of use will enable the lawful operation of the premises as a medical clinic, specifically for the benefit of The London Skin and Hair Clinic.

Paragraph 015 of the National Planning Practice Guidance Document "Use of Planning Conditions" (March 2014), states that

*"Unless the permission otherwise provides, planning permission runs with the land and it is rarely appropriate to provide otherwise. There may be exceptional occasions where granting planning permission for development that would not normally be permitted on the site could be **justified on planning grounds because of who would benefit from the permission**. For example, conditions **limiting benefits to a particular class of people**, such as new residential accommodation in the open countryside for agricultural or forestry workers, may be **justified on the grounds that an applicant has successfully demonstrated an exceptional need**."*

By way of the change of use, the first floor will be laid out to accommodate the following areas and treatment rooms:

- |   |  |
|---|--|
| Proposed First Floor<br>(Drawing ref: 1536-P01) | - A waiting and reception area;                |
|   | - 5 no. Consultation Rooms;                    |
|   | - 1 no. Private Consultant Room;               |
|   | - 2 no. Laser Treatment Rooms;                 |
|   | - 2 no. Operating Theatres;                    |
|   | - 1 no. Patient Preparation and Recovery Room. |
|   | - 3 no. Image Rooms;                           |
|   | - 1 no. Pharmacy;                              |
|   | - 1 no. Disposal Holding Room;                 |

- 1 no. Nursing station;
- 1 no. Staff Room;
- 2 no. Cycle storage Rooms for 14 no. bikes with ancillary shower, lockers and changing rooms;
- 1 no. Office and meeting room;
- 1 no. Clinical Store;
- 1 no. Samples Storage Room;
- 2 no. General Storage Rooms.
- 1 no. IT Server room

The proposed clinic will provide for the benefit of the local workforce in Central London, who require dermatological treatments and appointments with specialist Dermatologists, and are not able to attend appointments closer to home due to incompatibility with working hours and commuting times.

To ensure that the premise reverts to its previous office use upon withdrawal of the London Skin and Hair Clinic from the property, we propose that the following condition be imposed on any forthcoming approval of planning permission:

*The permission for Class D1 use shall ensure for the benefit of The London Skin and Hair Clinic or any other dermatology clinic for the time being having an interest, therein, and not for the benefit of the land or any other Class D1 operator. In the event that The London Skin and Hair Clinic or other dermatology clinic vacate the premises the Use Class shall revert to Class B1a (Office)."*

The proposed development will not require any external alterations to the existing building. Access to the Clinic will be taken via the existing entrance at 233 High Holborn comprising of two elevators and a staircase.

#### **d. The London Hair and Skin Clinic**

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The Clinic is a private medical dermatology clinic for the diagnosis and treatment of skin diseases affecting the skin, hair, scalp, lips, nails and genitals. In addition to treating general dermatology conditions, the Clinic has a number of specialist internal dermatology clinics which treat: Paediatric skin diseases, Skin Cancer and Melanoma, Acne, and hair and scalp conditions. The Clinic is private and not associated with the NHS and patients are typically referred by private GPs, recommended by private health insurers, or contacted directly by patients who do not wish to wait to be seen on the NHS.

The Clinic is currently based at Cavendish Square (Westminster) in the Harley Street medical district and seeks to move to Camden in order to facilitate their expansion and to be located in a Borough renowned for its health care provision. Patients of the Clinic travel from across London including Camden and are able to attend the Clinic before work, during lunch breaks or after work. As the NHS cuts back on non-essential services, the Clinic is finding that it needs to provide more and more skin disease services that were previously provided by the NHS. The Dermatologists at the Clinic all work part time within the NHS at hospitals across London including Great Ormond Street Hospital in Camden.

In terms of employment numbers, to below illustrates the current employment numbers and the proposed numbers of employees:

- |   |   |
|---|---|
| <p>Proposed Employment Numbers at 233 High Holborn.</p> | <ul style="list-style-type: none"> <li>- Managers: 2 (full-time)</li> <li>- Employees: 15 full time; 4 part-time</li> <li>- Contact Doctors: 19 (part-time)</li> <li>- Contact Staff: 3 (part-time)</li> <li>- <b>Total: 43 (2 Managers, 15 staff, 2 Doctors at any one time).</b></li> </ul> |
|---|---|

On weekdays, the Clinic will be open from 9am – 7pm, on Saturdays from 9am – 5pm and clinic is open on Sundays when patient demand necessitates. The Clinic would contribute to supporting the

mixed-use functionality of High Holborn, whilst contributing to the vitality of the street frontage and provision of high quality healthcare services within the borough, and wider London.

## **e. National Policy**

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The National Planning Policy Framework (NPPF), which came into effect on 27 March 2012, aims to strengthen local decision making and to reinforce the importance of up to date plans.

It is intended to refocus planning policy on encouraging growth, and thus the NPPF includes a powerful presumption in favour of sustainable development at **Paragraph 14**. Government expects that this presumption should run as a 'golden thread' through all plan making and planning application decisions.

**Paragraph 14** of the NPPF states:

*“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking this means:*

*Approving development proposals that accord with the development plan without delay”.*

**Paragraph 7** of the NPPF defines sustainable development as consisting of three dimensions: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- **An Economic Role** - contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying coordinating development requirements, including the provision of infrastructure;
- **A Social Role** - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and supports its health, social and cultural well-being; and
- **An Environmental Role** - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

The NPPF explains that these roles should not be taken in isolation, because they are mutually dependant. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

**Paragraph 17** sets out the 'Core Planning Principles' for both plan-making and decisions taking. Principle 12 includes the need to take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

**Paragraph 187** confirms that Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area and that decision-takers at every level should seek to approve applications for sustainable development.

**Paragraph 22** of the NPPF states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. It goes on to state that where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated

on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

#### **f. London Planning Policy**

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##### **The London Plan (July 2011) including Further Alterations to the London Plan (March 2015) and Minor Alterations to the London Plan (March 2016)**

In July 2011, the Mayor published the replacement of the spatial development strategy for London – known as the London Plan. The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031.

On 10 March 2015, the Mayor of London published Further Alterations to the London Plan (FALP); and on 14 March 2016, the Mayor of London published Minor Alterations to the London Plan (MALP). From this date, MALP & FALP are operative as formal alterations to the London Plan and form part of the development plan for London.

We consider the following policies to be relevant to the application proposals:

- **Policy 2.11 Central Activities Zone (CAZ) – Strategic Functions:** Confirms that the Mayor will, ensure development complements and supports the clusters of other strategically important specialised CAZ uses including health, whilst also recognising the ‘mixed’ nature of much of the CAZ;
- **Policy 2.12 Central Activities Zone – Predominantly Local Activities:** Outlines the Mayor and Borough’s should work with social infrastructure providers to meet the needs of both local residents and that generated by the large number of visitors and workers in the CAZ; and
- **Policy 4.1 Developing London’s Economy:** Seeks to promote and enable the continued development of a strong, sustainable and increasingly diverse economy.
- **Policy 6.9 Cycling:** Sets out to developments should provide secure, integrated, convenient and accessible cycle parking facilities. The policy highlights the minimum cycle parking standards for D1 use are 1 space per 5 staff long stay, and 1 space per 3 staff short stay.

We now turn to set out the relevant local planning policy.

#### **g. Local Planning Policy**

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The Proposals Map accompanying the Local Development Framework for Camden, allocates the site as within an Archaeological Priority Area, the Central London Frontage, the Central London Area, the Holborn Growth Area, and as part of the Bloomsbury Conservation Area.

As such, the following planning policies are considered to be relevant to the application proposal:

##### **The Camden Core Strategy 2010 – 2015 (November 2010):**

- Policy CS1 – Distribution of growth;
- Policy CS2 – Growth areas;
- Policy CS5 – Managing the impact of growth and development;
- Policy CS8 – Promoting a successful and inclusive Camden economy;
- Policy CS9 – Achieving a successful Central London;
- Policy CS10 – Supporting community facilities and services;
- Policy CS11 – Promoting sustainable and efficient travel;

- Policy CS14 – Promoting high quality places and conserving our heritage; and
- Policy CS16 – Improving Camden’s health and well-being.

**The Camden Development Policies 2010 – 2015 (November 2010):**

- DP12 – Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses;
- DP13 – Employment premises and sites;
- DP15 – Community and leisure uses;
- DP16 – The transport implication of development;
- DP17 – Walking, cycling and public transport;
- DP18 – Parking standards and limiting the availability of car parking;
- DP25 – Conserving Camden’s heritage; and
- DP26 – Managing the impact of development on occupiers and neighbours.

**Camden Core Strategy (November 2010)**

**Policy CS1** sets out the Council’s overall approach to growth and development in Camden, and confirms that a concentration of development will be promoted in allocated Growth Areas, including Holborn.

**Policy CS2** states that development in Camden to 2025 will be concentrated in the growth areas of King’s Cross, Euston, Tottenham Court Road, Holborn and West Hampstead Interchange. The Council will expect development in the growth areas to maximise site opportunities, provide appropriate links to, and benefits for, surrounding areas and communities, and be in accordance with the Council’s aspirations and objectives for the area.

The Council’s objectives for Holborn include a mix of land uses (housing, offices, retail and service uses), improvements to the street environment, high quality sustainable design and improved community safety. The London Plan expects a minimum of 2,000 new jobs and 200 new homes in the area until 2031. The Council expects that the London Plan targets will be met through relatively small scale, private sector-led schemes, reflecting that the area’s potential for intensification is largely from the redevelopment of existing properties, particularly offices, at higher densities.

**Policy CS5** seeks to manage the impact of the Camden’s growth through ensuring a range of uses and facilities which meet the needs of Camden’s population and contribute to the borough’s London-wide role, for those who work in and visit the borough.

**Policy CS8** sets out to promote a successful and inclusive economy through supporting the borough’s mix of employment facilities and types. The policy also recognises the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.

**Policy CS9** seeks to ensure that development in Central London, in the growth areas of King’s Cross, Euston, Tottenham Court Road and Holborn and beyond, contributes to London’s economic, social and cultural role while meeting the needs of local residents and respecting their quality of life, whilst supporting residential communities within Central London by protecting amenity and supporting community facilities. The Policy also provides support for the concentration of medical, educational, cultural and research institutions within Central London.

**Policy CS10** states that the Council will ensure that community facilities and services are provided for Camden’s communities and people who work in and visit the Borough.

**Policy CS11** promotes the use of sustainable and efficient means of travel across the Borough to reduce the environmental impact of travel and minimise congestion.

**Policy CS14** seeks to ensure Camden's rich heritage assets and their setting (Conservation Areas and Listed Buildings) are preserved.

**Policy CS16** states the Council seek to improve health and well-being in Camden and recognises and supports the concentration of centres of medical excellence and their contribution to clinical expertise, employment and training provision. The policy also supports the provision of new or improved health facilities.

#### **Camden Development Policies 2010 – 2015 (November 2010)**

**Policy DP12** sets out the general development criteria for development in town centres, including a consideration of amenity, servicing, noise and crime.

**Policy DP13** seeks to retain buildings suitable for continued business use and resist a change to non-business, unless: it can be demonstrated to the Council's satisfaction the building is no longer suitable for existing business use; and there is evidence that the possibility of retaining, reusing or redeveloping the building for similar or alternative business use has been fully explored.

**Policy DP15** aims to meet the increased demand for community facilities (healthcare) and ensure they are accessible by a range of transport modes and located in the Central London Area.

**Policy DP16** sets out to ensure development is supported by adequate walking, cycling and public transport links.

**Policy DP17** highlights the Council aim to promote walking, cycling and public transport use in order to reduce travel by private motor vehicle.

**Policy DP18** outlines the Council's aim to provide necessary cycle parking provision in the Borough, and expects new developments to meet the minimum standards for Class D1 use. This requires Staff cycle parking to provide 1 space per 250 sqm, and 1 space per 250 sqm for Visitor cycle parking.

**Policy DP25** states development within Conservation Areas will be permitted if it preserves the character and appearance of the area and to preserve the Borough's listed buildings.

**Policy DP26** confirms that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity, having regard to privacy and overlooking, overshadowing, sunlight/daylight, noise/vibration, odour, and microclimate.

Due regard has also been given to the Camden Planning Guidance Document 5 – Town Centres, Retail and Employment, specifically Section 7 – Employment Sites and business premises.

Paragraph 7.3 of the Guidance Document outlines the circumstances under which the Council may allow a change from B1(a) offices to another use. In such circumstances, the Council will prefer to replacement use to be permanent housing or community use.

Paragraph 18 also outlines that the Council will require evidence of marketing to justify the loss of an employment use in Camden, including the use of a reputable agent, a visible lettings board, publication on the internet, a continuous marketing period of at least 2 years (shorter marketing period for B1a office premises), reasonable rents reflecting market value, attractive lease terms, and a commentary of interest.

#### **h. Heritage Statement**

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The building at 233 High Holborn is Grade II listed, and the Listed Building Description taken from the Historic England 'National Heritage List for England' reads as follows:

*"Office block. 1930. By Frederick Etchells & Herbert A Welch. For the advertising agency WS Crawford Ltd, remodelling an existing building. Steel frame construction with brick panel infilling. External finish of roughcast cement with polished black marble ground floor frontage. 6 bays with*

*splayed corner bay. Double entrance doors of plain stainless steel with grille over. Continuous strip windows with frames and mullions of stainless steel glazed with prismatic glass alternate with bands of roughcast. INTERIOR: contemporary internal decor and fittings remained in 1973 but very little now. HISTORICAL NOTE: a pioneer work of the Modern Movement in England, the office block has good claim to be the first office block in England inspired by the International style. Etchells started his career as a Vorticist painter in Paris before the First World War, turned to architecture in the 1920s and was a founding member of the Twentieth Century Group in 1930. In 1927 he translated Le Corbusier's "Vers une Architecture" into English: he ended his career restoring churches in Berkshire. (The Buildings of England: Pevsner N & Cherry B: London, 1, The Cities of London and Westminster: London: -1972: 362)."*

As stated within the Listed Building Description, very little of the original decorative scheme or fittings remain within the building; these elements are restricted to the entrance lobby and stairs. The current form of the first floor within 233 High Holborn is entirely modern, and no original features remain. No works will be undertaken to structural or external features of the building, including windows, doors and existing walls and columns. The fit out works proposed to accommodate the change of use and layout to one floor of the building do not have the potential to affect the recognised historic or architectural significance of the listed building, or its character and appearance, and therefore Listed Building Consent is not required for these works.

#### **i. Marketing Report**

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The Marketing Report submitted in support of this application, prepared by CBRE and commissioned by our client, The London Hair and Skin Clinic, relates to the existing office premises of the First Floor of 233 High Holborn.

The report outlines the marketing activity, which noted the available accommodation was brought to the market in October 2015 and there was little interest in the premises. CBRE advised their client carry out the comprehensive Category A refurbishment and they updated their marketing details reflecting of the refurbishments, which were circulated to agents and companies again. Despite the competitive pricing, there was little interest and the First Floor remained vacant until the Clinic viewed the property in August 2016.

Paragraph 22 of the NPPF confirms that where there is no reasonable prospect on the site being used for traditional employment purposes, applications for alternative uses should be considered on their own individual merits. As such, in the absence of any interest in the property for 12 months we consider this application should be considered in accordance with other relevant planning policies and the presumption in favour of sustainable development.

#### **j. Compliance with Planning Policy**

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In accordance with Paragraph 14 of the NPPF, and the presumption in favour of sustainable development, the Council are required to approve development proposals that accord with their development plan without delay.

The proposal represents an entirely sustainable and suitable development that will improve health and well-being in Camden and support continued employment opportunities at the site.

#### **The Three Dimensions of Sustainable Development**

The application seeks permission to change the use of the premises to Class D1 (Non-Residential Institution), to allow the first floor of the premises to be used as a medical clinic.

The proposed use of the premises by the London Skin and Hair Clinic for Class D1 purposes will support a healthy community in London, by providing accessibility to an essential medical clinic facility, with the convenience of a central location, contributing to social well-being in the area.

The Clinic will be sustainably located (PTAL 6b), in an established commercial area which benefits from a range of public transport facilities, including Holborn and Chancery Lane Underground

Station. The proposed clinic will also be within close proximity of a large working and visiting population, reducing the travel time and inconvenience for those working locally and in need of such services. The Clinic will offer out-of-hours appointments (until 7pm on weekdays), to the local working population in Holborn, providing specialist care for dermatological conditions affecting the skin and hair (amongst others). The Clinic also provides specialist internal dermatology clinics for skin cancer and melanoma, acne, and hair loss.

In addition to the inherent sustainability benefits of occupying and bringing an existing property back into productive use within a sustainable location, by virtue of the proposed change of use, The London Skin and Hair Clinic will employ 43 members of staff on the premise, 17 of which will be full time employed, totalling a Full Time Equivalent of 25.6 members of staff.

The Full Time Equivalent equates the need for 5.13 long stay cycle spaces and 8.5 short stay cycle spaces, totalling 14 spaces, in accordance with London Plan Policy 6.9. The proposed change of use provides the required 14 spaces set out by London Plan Policy 6.9 and benefits from nearby on-street cycle parking within close proximity to the application premise along High Holborn and the A4200. Furthermore, the site benefit from close proximity to London's Cycle Hire Bays, with the closest located approximately 140 metres to the west.

Whilst the site represents a sustainable location to accommodate the new clinic, with accessible local facilities and transportation, the proposal also seeks to deliver a highly quality, sustainable form of development, achieving economic, social and environmental benefits.

In light of the above, in the context of Paragraph 14 of the NPPF, the proposed use of the site for medical purposes represents an entirely sustainable development.

### **Principle of Development**

Policies CS1 and CS2 seek to concentrate new development to Growth Areas, including Holborn. Policy CS2 specifies that the Council will expect development in the Growth Areas to maximise site opportunities and provide links to, and benefits for, surrounding areas and communities.

In addition, Policy CS9 provides support for development in Central London that meets the needs of local residential communities by protecting amenity and supporting community facilities. The policy also provides support for the concentration of medical, educational, cultural and research institutions in Central London, whilst Policy CS10 also states that the Council will ensure that community facilities and services are provided for Camden's communities.

Policy CS16 deals specifically with healthcare facilities in Camden, and provides support for their continued supply.

As mentioned above, the proposal will utilise an existing vacant premises within both Central London and the Growth Area of Holborn, to provide essential dermatological care for Camden's communities and people who work in and visit the area.

As a high accessibility site, with a PTAL Rating of 6b and within walking distance of a range of businesses and services, the use of the site for medical use will provide convenient and accessible access to the dermatological care, providing health and social well-being benefits for those individuals.

The proposed clinic will also retain an employment generating use on the site, employing 38 members of staff, in accordance with Policy CS8 of the Core Strategy (2010)

Notwithstanding the above, and in recognition of the requirements of Policies CS8 and DP13, a Marketing Statement has been prepared by CBRE, which outlines that marketing of the property for office use has taken place over the last year. The Statement gives evidence that despite best attempts, that re-use of the property for office purposes was not viable in the short-medium term, particularly in light of the recent 'Brexit' vote, and the availability of newer office premises nearby.

Additionally, we note that a report (Business Premises Study 2011) was commissioned by the London Borough of Camden, in order to review and explore the current employment space. The report identifies that there is no quantitative shortage of office floorspace in the Borough with enough office development to meet the long term demand, and in the short term, no indications that the market is undersupplied.

In light of the above, and having regard to the Council's Planning Guidance Document (Number 5 – Town Centres, Retail and Employment), we understand that in such circumstances (i.e. where a B-Class employment use is no longer viable), the Council will prefer a housing or community-type use.

Class D1 uses are deemed to fall within the category of 'community' uses, and are therefore an acceptable alternative use for employment floorspace.

Furthermore, by way of the proposed personal planning permission for the site, the use of the building will revert back to its previous 'office' use, at such time that the London Skin and Hair Clinic vacate the premises, maintaining the office stock in Camden, in accordance with Policies CS8 and DP13.

In light of the above, the proposed use of the property to provide healthcare facilities is in complete accordance with Policies CS1, CS2, CS8, CS9, CS10 and CS16 of the Core Strategy (2010), and Policies DP12, DP15, and DP16 of the Camden Development Policies Document (2010).

### **Amenity**

The application site will be utilised as a medical clinic, providing dermatological care and treatment between the hours of 9am – 7pm Monday to Friday and 9am – 5pm on Saturdays. Given the location of the site, in a primarily commercial area, it is not anticipated that the use of the building for Class D1 purposes would result in any level of noise disturbance over and above the existing position.

Semi-obscure window film will be used internally to ensure privacy for patients at the Clinic, and all medical waste will be disposed of via a service agreement with a registered medical waste disposal supplier.

A range of medical equipment will be utilised on site. However, no special ventilation or odour control is required to facilitate these machines. As such, having regard to Policies DP12 and DP26, the use of the building is not anticipated to result in any loss of amenity to neighbouring occupiers.

### **k. Conclusion**

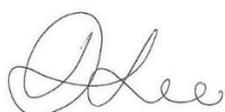
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The London Skin and Hair Clinic would make a positive contribution to the provision of healthcare facilities and community life of the area providing essential medical facilities to local residents, and the working population.

The proposal is in compliance with National planning policy and in accordance with the provisions of Mayor's London Plan (March 2016), the Camden Core Strategy (November 2010), the Camden Development Policies (November 2010). As such, we conclude that the proposed change of use is entirely appropriate in planning policy terms.

We trust that you have sufficient information to determine this application but should you have any questions or queries in the meantime or require any further information, please do not hesitate to contact myself (020 3725 3841) or Charlie Merry (020 3640 1034) of this office in the first instance.

Yours faithfully,

A handwritten signature in cursive script, appearing to read 'A Lee', is positioned below the text 'Yours faithfully,'.

Danielle St Pierre  
Senior Planner