

Dear Samir,

I am a resident at House 6, 39 College Crescent and I am writing to you about application number 2019/1070/P to change the office at 39 College Crescent, NW3 (currently Class B1a) to a therapy clinic (Class D1). I have read the application and believe the council is being misled as to the objective facts and thought a few points should be clarified.

The purpose of this email is to provide the council with what I believe to be the correct background which I do so below.

If you have any questions please do not hesitate to contact me on [REDACTED] I am happy to discuss any of the points below.

If you have to publish this email then I kindly ask for my contact details, address and name to be redacted for privacy reasons.

Thank you for your time and help.

1. **Neighbouring Amenity:** The application states that residents will not be impacted by the change. This is not true for several reasons. The salient points to note include:
2. Unlike other residential buildings on College Crescent, 39 College Crescent is a small private gated community consisting of 6 houses and one office building. The basis on which these properties were marketed to and purchased by the current residents was to enjoy the privacy and security of a gated community with limited flow of people and the benefit of a court yard where infants (such as the babies at house 1 and house 2) and young children (such as those at house 6 and house 2, and most recently house 3) as well as older children (such as those in house 4) could play safely. There is only one entrance into the complex which is the gate. In addition there is a garage for the residents to park their cars.
3. For reasons discussed in more detail below, the change in office hours and the frequency and number of patients arriving at the clinic at 39 College Crescent will fundamentally change and impact:
 - a. *(i) the ability for the residents to quietly enjoy their homes;*
 - b. *(ii) the privacy and safety of the residents (as the 6 houses within the small gated community);*
 - c. *(iii) 10 children who will not be able to play freely in the court yard which currently is a safe and secure environment;*
 - d. *(iv) the residents who will be exposed to the increasing crime incidents we are seeing on College Crescent by compromising the safety of the gated community;*
 - e. *(v) everyone on College Crescent who will be exposed to increased people traffic and perhaps increased vehicle traffic (including taxis taken by patients);*
 - f. *(vi) it will contradict council / public policy and the vision set out in the Camden Local Plan; and*
 - g. *(vii) it will increase an intrusion of privacy specific to House 6 only (discussed below)*

The relevant reasons for the points made above include:

4. Noise caused by long Office Hours and Increased People Traffic:
 - a. **Office Hours:** Until further clarity lets assume the proposed clinic will follow the same office hours as Mr Silvert's current clinic (Blue Tree Clinic, 85 Wimpole Street) which appears to take appointments between 8am to

9pm every day of the week, assuming a 1 hour appointment and 20-30 minutes for staff to tidy up at the end of the day the residents will hear people leaving until 10:30pm every day).

b. People Traffic: Estimating the people traffic is important as the figure will be in the hundreds. There are different ways to estimate the number of patients. One approach could be to estimate a range: At the low end, what is the minimum number of therapists required in the clinic to make it a viable business (i.e. full-time equivalent)? Let us assume three therapists (I understand Dr Silvert employs 10 therapists) and that the clinic is open 13 hours a day, every day of the week. Assume 10 patients a day per therapist then that implies 30 people per day or 210 per week coming through the gate (from early morning to late into the evening) or *840 patients per month that will be entering what currently is a very small private gated community with 6 houses*. Note that as the assumptions change so will the estimates but the magnitude will still be in the 100s and the implications as discussed below will not change. For instance, if all 10 therapists worked at the clinic, had 10 patients per day, each of the 7 days then that would imply *2,800 people per month*.

c. Lily's Kitchen: In comparison, Lily's Kitchen had a few employees. The same people would arrive in the morning and leave around 18:00 every weekday (they would not work on the weekend). In addition there was no people traffic as Lily's Kitchen was an office so there was minimal noise.

5. *Clause 6.4.1 in the planning application to the council makes the point that "the number of daily movements / visitors to the site" will be "very similar". I believe this misleads the council and is not true.* The small gated community is a collection of a few families and is too small relative to the disproportionately much larger potential size of the clinic (when the number of patients are taken into account).

Privacy and Security Issues caused by Increased People Traffic:

6. Impact on Children Safety and Loss of Open Space/Play Area: *With at least 840 people per month coming and going from the property it will be impossible for the children to play in the court yard given (i) the flow of people as well as (ii) the - additional – security risk that will be caused because the gate door will be frequently opened and other unknown individuals could enter the property* (i.e. how could anyone know whether someone was a stranger or a patient?)

7. Impact on Resident (and Children) Safety: *The number of crime incidents in the area has increased over the last 18 months (with at least 3 incidents at 39 College Crescent alone). The increase in people traffic due to the clinic exacerbates the risk of crime and further exposes the residents.*

8. Impact on All Residents on College Crescent and Environment (not just 39 College Crescent): Pollution, People Traffic and Car Traffic: The increased number of people will make the small side walk exceptionally busy (which is already busy because of the schools); it cannot be assumed that all of these patients will walk to the clinic and some may very well use cars (or taxis) to come to the location. Using the assumptions above, *if 840 patients use the clinic per month and 50% of these use a vehicle then this would result in 420 vehicles coming through college crescent which will (i) increase pollution, (ii) increase traffic on what is a very small road, (iii) increase the risk of a car accident (as children occasionally do run through the streets during school time) and (iv) create parking issues in a limited parking space area (to the extent the vehicles are not taxis). Obviously if all 10 therapists worked at the clinic, then the number of patients and vehicles would be materially higher*

Other Observations

9. Alternative Locations: The treatment of mental health patients is important – within our family we have several members that are mentally ill and require treatment so I know first hand the importance of having treatment available. However, such treatment facilities cannot be at the expense of local communities and residents and expose children. There are many alternative locations in the area that could be used that are more appropriate; patients will easily travel to seek their treatment (i.e. currently Blue Tree Clinic patients travel to Harley Street, if the new location was College Crescent or one of the commercial properties/office spaces in Hampstead or somewhere else nothing would change from the patient's perspective (and they would still get the treatment they need) but everything would change from the perspective of the local community / residents at College Crescent). I understand the office space at 39 college crescent is currently being marketed by a real estate agent at above market rents, if there is no interest it is not a reflection of a lack of demand for the location but more a reflection of the lack of interest in taking an office at that price / rent level (because it is being marketed at an above -market rent).

10. Office Space and Public Policy Considerations: I understand Camden council has set out their vision and desire, in the Camden Local Plan (section E2), to prevent office space from being converted for alternative uses unless (a) it is no longer suitable or (b) the possibility for using it for a similar type of business has been fully exhausted and explored. A few observations may help:

- in relation to (a) the office space is still suitable for a new business (nothing has changed)
- In relation to (b) the marketing effort at an above-market rent may result in a new business not showing interest but that is more a reflection of the above market / unrealistic price (sure, one can always ask for £180,000 for their house but they shouldn't be surprised if no one buys it for that price if the house is only worth

£100,000). The council should not be misled. The objective facts should speak for itself as to what the market rent levels are (an independent 3rd party could easily provide this to the council).

c. If this space is allowed to be converted to a Clinic then one of the few office spaces we have will be lost and this will be despite the public policy the council has set out for itself

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House 6: Specific Considerations

11. Privacy of House 6: Separately, a specific issue with this application, as it applies to House 6, is that the Clinic looks directly into two floors of House 6 (6 large windows). While Lily's Kitchen (the previous occupier) occupied the office space (1) they were there only the weekdays and left at 6pm (instead of the weekends and the late hours with the Blue Tree Clinic), (2) it was a limited number of employees, and — most importantly — (3) there was no people traffic coming into the office who may regularly look through the windows invading our privacy (which will be the case with the clinic, see further below)

Thank you for your time. If you have any questions or would like to clarify anything please do not hesitate to contact me.
