

Planning Statement

Change of use from Class B1 to a Dual Office and Health Clinic
(B1/D1)

Suite G02

344-354 Gray's Inn Road

London

WC1X 8BP

June 2019

London Borough of Camden

Contents

1. Introduction	1
2. Site Context	2
Local Area	2
PTAL Designation	2
Planning Designations	2
Planning History	3
3. Proposal	5
4. Planning Considerations	6
Principle of Development	6
Heritage	7
The Need and Demand for the Medical Facility	8
Economic Sustainability	8
Social Sustainability	8
Clinical Waste	8
5. Material Considerations	9
National Planning Policy Framework (NPPF 2018)	9
The London Plan (2016)	9
6. Conclusion	11



1. Introduction

- 1.1. This planning application seeks the retrospective change the use of Suite G02 on the ground floor at 344-354 Gray's Inn Road, London, WC1X 8BP from a B1 office use, to a dual Class B1/D1 use to allow the operation of a doctor's clinic.
- 1.2. The applicant (London Doctor's Clinic) is seeking to re-locate from Room 3.7 on the 3rd Floor in this building to the Suite G02 on the Ground Floor, to enable better access for their clientele. The clients' lease was finishing in April 2019 for the space on the 3rd floor & London Doctor's Clinic were keen to change to the Ground Floor as there are two reception desks that patients have to go through to get to the 3rd Floor. By moving down to the Ground Floor, only one receptionist is required and the 'patient journey' is thus reduced and simplified. The office space is marginally larger on the ground floor, allowing for more spacious consolation rooms and some additional storage.
- 1.3. The proposed use is a "dual" use of B1/D1 to allow sufficient flexibility, and to maintain the notion that the room can be easily reverted back to Class B1, its original established use, if the need arises.
- 1.4. This application site is to be occupied by London Doctors Clinic (<http://www.londondoctorsclinic.co.uk/>). They offer general practice consultations for diagnosis, treatment or general medical problems at a very reasonable cost. The clinic employs fully trained specialist doctors.
- 1.5. This planning statement seeks to demonstrate that the proposed change of use complies with the current objectives of the NPPF, London-wide and local planning policy.



2. Site Context

Local Area

- 2.1. The application site (Suite G02) is a 31.5 sqm serviced office suite, forming part of the ground floor of 344-354 Gray's Inn Road. The building of 344-354 Gray's Inn Road is a Business Centre comprising serviced offices and meeting rooms all within the B1 and D1 use class.
- 2.2. The application site is located on the eastern side of Gray's Inn Road and consists of a substantial 5 storey period property. The surrounding area has a mix of uses including residential, hotels, retail and office space. The nearest tube/train stations are Kings Cross and St. Pancras.

PTAL Designation

- 2.3. The site has excellent public transport connections with a multitude of bus services operating on Gray's Inn Road and surrounding roads such as Euston Road.
- 2.4. The PTAL score provides a basic overview of a sites access to public transport within the vicinity of the location. According to the PTAL WebCAT from Transport for London, the proposal site has a score of 6b (Best Score). This is particularly relevant for this application, as future patients of the clinic would have an array of transport options available.

Planning Designations

- 2.5. The site is identified on the Camden Policies Map (March 2019) as being located within the Central London Area, a conservation area and within a Designated View viewing corridor. The building is not listed.





Image of the Site: Planning Proposals Map
 Source: Camden's Policy Map March 2019

Planning History

2.6. There are several recent planning applications relating to this building, of a similar nature. In July 2014, planning permission was granted for the change of use for office to a dual B1/D1 use to allow the lawful operation of a travel clinic. Planning Application reference: 2014/3599/P.

2.7. The decision notice considered the application and concluded:

Although current policy advocates the retention of employment floorspace within the borough, it is considered that the change of use to a dual use would not result in harming the economic viability of the area/site given that the overall floor area space affected is 30.5m² where the overall floor area is 226.66m². As no external alterations are proposed and the hours of operation are considered to be conducive to residential development, it is considered that the proposed development would not unduly harm the amenity of any adjoining/nearby residential occupiers in terms of noise, loss of light, outlook, enclosure or privacy.

2.8. The same conclusions can be applied to this application to demonstrate consistency in decision making.



- 2.9. The original application for the London Doctor’s Clinic in 2016 was for Room 3.7 at 344-354 Gray’s Inn Road, this is by the same applicant, (London Doctor’s Clinic) and for the initial office that they operated from. The company are wanting to move into a similar sized office (the new office is 2.5 sqm larger) on the Ground Floor rather than the 3rd floor, to give their clients better access. Reference: 2016/1098/P.
- 2.10. In the decision notice it was stated;

No external alterations are proposed and as a result there would be no harm to the character and appearance of the host building, the street scene or wider area. The proposal would result in a loss of 29.0sqm of office space which is contrary to policies CS8 and DP13 of the Local Development Framework. There is a need for medical general practitioners within the area and the remainder of the building will continue to provide office employment. On balance the loss in small amount office floorspace that goes some way in meeting a community need as proposed proposal is considered to be acceptable.

- 2.11. The same conclusions can be applied to this application.



3. Proposal

- 3.1. The application seeks to change the use of Suite G02, Ground Floor, 344-354 Gray's Inn Road, WC1X 8BP to a dual B1/D1 use to allow the lawful operation of a doctor's clinic, to support the continued success of the business in the local area.
- 3.2. Many workers would like the convenience of seeing a GP close to their work, as it is hard to get convenient appointments near home. This is largely because appointment times are incompatible with work commitments, especially when managing a long-term health condition.
- 3.3. The clinic will be fast, flexible and focused on efficient management of the most frequently seen conditions in the professional working population.
- 3.4. The clinic will offer appointments throughout the day and on Saturdays. Proposed opening times are as follows:
 - Monday to Friday: 09:00 – 17:30
 - Saturday: 09:00 – 17:30
 - Sunday: 09:00- 17:30
- 3.5. Patients will utilise the current means of access into the building from the Ground Floor on Gray's Inn Road.
- 3.6. The proposal will not require any external alterations to the building nor any major physical internal alterations. The proposed works are limited to:
 - Decoration
 - New partition walls – the office is being divided into x2 clinic rooms and x1 small reception area.



4. Planning Considerations

4.1. This Statement demonstrates how the proposed scheme responds to the planning requirements set out in the National Planning Policy Framework, the London Plan (2016), the Camden Local Plan (2017) and any relevant supplementary planning documents.

4.2. We have addressed the following planning issues below: (i) the principle of the change of use (ii) the impact on the conservation area.

Principle of Development

4.3. Planning permission is sought for the change of use of Suite G02 on part of the Ground Floor of 344-354 Gray's Inn Road, from an existing Class B1 office use to a flexible Class B1/D1 dual use. This suite only has a floor area of just 31.5 sqm and forms just a small area within the larger office space on this floor.

4.4. The site is located in the Central Activities Zone (Core CAZ) and Central London Zone (in Camden) and the Kings Cross and St Pancras Conservation Area.

4.5. Policy C1 of the Camden Local Plan (2017) – Health and Wellbeing. The aim of this policy is to support health, social and cultural wellbeing and reduce inequalities through the provision of new or improved health facilities. It seeks to ensure that development will contribute to the creation of high quality, safe and accessible places. The proposed change of use would comply with this policy aim.

4.6. Policy C2 – Community Facilities, this policy seeks to ensure that community services are developed and modernised. Developments should be accessible on foot and by sustainable methods of travel. The reason for this application is to move from the current premises on the 3rd Floor to the Ground Floor, to enable a more direct route to the clinic and cutting out one reception desk. The location of the building is in very close proximity to a major transport hub; Kings Cross St Pancras, and thus has the highest sustainable transport PTAL score.

4.7. Policy E1 – Economic Development. This policy aims to secure a successful and inclusive economy in Camden creating the conditions for economic growth and harnessing the benefits for local residents and businesses. Health is one of the key important



employment generating uses highlighted in this policy. This application seeks to provide an existing service in a new location within the same building.

- 4.8. Policy A1 – Managing the Impact of Development. This policy seeks to protect the quality of life of the neighbours and occupiers of the development to ensure there is no unacceptable harm to amenity. As the Health Clinic has already been in operation in the same building for several years, and there are no external changes to the building proposed, this application will meet Policy A1.
- 4.9. This application seeks to change the use to a dual B1/D1 use, this will ensure there will be no loss of office floorspace. Critically, it will also enable the continued success of a valued health service for individuals working and living in the surrounding area and give them greater flexibility in getting health appointments.

Heritage

- 4.10. Policy D2 of the Camden Local Plan seeks to preserve or enhance the character and appearance of Conservation Areas
- 4.11. The Kings Cross Conservation Area Statement (2004) mentions Pioneer House 344-348 Gray’s Inn Road (Sub Area 4) in the Conservation Area Statement as follows:

344-348 Gray's Inn Road is a four-storey Edwardian office building with a recent mansard addition. The building is constructed of red brick with buff stone banding at 1st and 2nd floors, and has timber sash windows. Its façade has a shallowly projecting central entrance bay with stucco rustication at ground floor level, an arched stone entrance which is surmounted by cast iron balconies at first to third floor level and an arched pediment at roof level. It has modern shopfronts inserted at ground floor level on either side of the central entrance bay which relate poorly to the existing building in terms of detailing and materials.

- 4.12. The building is not highlighted as having any significant or valuable architectural contribution to the Conservation Area. However, this proposal does not seek to change any of the external features of the building and therefore complies with Policy D2.



The Need and Demand for the Medical Facility

- 4.13. The majority of patients using the London Doctor’s Clinic, chose it because of the flexibility and convenience they offer, and their close proximity to work/transport links.
- 4.14. LDC’s patients are mainly commuters who live outside the Borough and work a significant distance from their registered NHS practise. This allows them to see an LDC doctor during the day instead of taking time off work for an appointment at their local surgery.
- 4.15. LDC provide a service to overseas visitors including forgotten prescriptions and dealing with referrals from travel insurance companies.
- 4.16. LDC support corporate and SME businesses in the delivery of their health and well-being strategies by providing GP services as an employee benefit. This covers both physical and mental health.
- 4.17. Prompt and fast test results are a key benefit to LDC’s offering, as they are able to offer some blood and urine test results within 4 hours, which is quicker than most NHS services.

Economic Sustainability

- 4.18. The clinic provides employment opportunities for trained medical professionals as well as non-trained administration staff. The business is growing, and its services are in real demand from the workplace population due to their convenience.

Social Sustainability

- 4.19. The clinic plays an important social role due to the services it offers. The clinic offers a quick and convenient and accessible service to workers and visitors to the area who cannot afford the time to make a doctor’s appointments.

Clinical Waste

- 4.20. Clinical waste would be stored in special purpose bins and clinical waste bags. It will be collected by a specialist and licensed clinical waste contractor (SRCL) and separated from general waste. Collection would occur on a weekly basis.



- 4.21. A Waste Management Plan has been submitted with this application and provides further details and drawings on the provision of clinical waste bins and information on how it will be collected and disposed.

5. Material Considerations

National Planning Policy Framework (NPPF 2018)

- 5.1. Chapter 8 – Promoting healthy and safe communities. This chapter aims for decision which promote healthy, safe and inclusive places. Factors contributing towards this include; promoting social interaction, providing safe and accessible developments and enable and support healthy lifestyles (paragraph 91). Paragraph 92 sets out how planning polices, and decisions should;

Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

The London Plan (2016)

- 5.2. The London Plan is the statutory spatial development strategy for the Greater London area and published by the Greater London Authority.
- 5.3. Policy 3.2 Improving health and addressing health inequalities. Part D of the policy notes;

new developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help reduce health inequalities.

- 5.4. Policy 7.1 Lifetime Neighbourhoods goes on to say that;

Development should enable people to live healthy, active lives, should maximise the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security.



- 5.5. The London Plan, as per other local policy specifically seeks to ensure, protect and promote the mixed-use nature of London's offices to help promote vital services, including the provision of local services and healthcare. This proposal would continue to provide healthcare facilities for the use and benefit of the local and working population.



6. Conclusion

- 6.1. The proposal will allow health services to be more accessible and at convenient times for local workers and visitors. The change of use will not alter the operation of the building in any way, as the loss of office floorspace is very minor in comparison to the scale of the building. It should be emphasized that this application is an internal office move from the 3rd floor to the Ground Floor.

- 6.2. There will be no external alterations and the patients will utilise the existing access. The application will allow for an existing successful business to continue, to the benefit of the local living and working population. It is considered that the development proposal accords with local and national planning policy and meets the aims of sustainable development.

- 6.3. We respectfully ask that planning permission is granted.





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