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**Mr Obote Hope**

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*VIA EMAIL to [Obote.Hope@camden.gov.uk](mailto:Obote.Hope@camden.gov.uk)*

Dear Obote,

**Planning Application 2019/3257/P Retrospective Change of Use to Doctor's clinic  
(Dual B1/D1)**

Thank you for your time on the phone earlier. Here is our response to the objection to the application from the policy team due to a loss of B1 use as part of the proposal & request for marketing information.

This letter sets out:

1. The nature of this application - an internal office move rather than a brand new application;
2. Decision examples from both Camden and other London Boroughs for similar applications;
3. Appropriate condition
4. Information about the need for these facilities in Camden.



## 1) Relocation within the same office block

We would like to highlight that this application is in respect of an internal office move, rather than a completely new application. Previously London Doctor's Clinic had facilities on the 3rd Floor in the same building and this application represents their request for approval for a move to the ground floor of the same building. The previous approved application reference was 2016/1098/P. Therefore the principle of the change of use within the building has already been set. The reason why the clinic has relocated is due to the fact that previously, when they were located on the 3rd floor, individual patients had to be met by the Clinic Manager in order to gain access to the consultation rooms as the access from the lift was locked & patients had to go through two reception areas to get to the clinic. The space that was previously occupied by the medical clinic (on the 3rd floor) is now vacant and available for let as an office. Therefore, there is no net loss of office space.

## 2) Decision Examples

There have been a number of similar applications throughout the various London Boroughs for London Doctor's Clinic, here are some reference examples by way of precedent and to demonstrate consistency in decision making.

- **2018/5281/P** | Change of use from office (Class B1) to a dual office & health clinic (Class B1/D1) (retrospective) | 1st floor offices 118, 120, 122 16 Upper Woburn Place London WC1H 0AF | Camden, approved 21st December 2018. This proposal was for a B1 to B1/D1 flexible change of use. This site was comparable to our proposal in that it was accessible, had no external changes proposed, would operate in a similar capacity to an office use and would provide a health service. The entire building, similar to the proposal site would retain its predominant office use whilst allowing a flexible B1/D1 use for the subject units.
- **19/02241/FULL** | Use of Room 1605 on 16th Floor as dual office/ health clinic use (Class D1/B1). | Portland House Bressenden Place London SW1E 5BH . City of Westminster. Approved 18th June 2019. Comparable to the current application - operated in a similar capacity to the office units, on an appointment only basis.
- **2018/3508** | Change of use from Class B1 (Office) to transferable Class B1 or D1 (office or Health Clinic) use | Unit G.05 Eagle House 167 City Road London EC1V 1NR. Hackney. Approved 13th December 2018. Comparable situation to the above examples.
- **19/04424/FULL** | Dual / alternative use of Suite 101E and part of 101D at first floor level as dual / alternative health clinic (Class D1) or office (Class B1) | Room 101E First Floor, 18 Soho Square, London, W1D 3QL. City of Westminster. Approved 16th July 2019.



### 3) Appropriate condition

There is also the opportunity to apply a condition, as used on the Soho Square and Portland House Decision Notices, which restricts the use to a medical practice rather than generic D1 such as the example below:

*"You may use this area (defined on site plan) only as a medical use. You must not use it for any other use within Class D1 of the Town and Country Planning (Use Classes) Order 1987 as amended April 2005 (or any equivalent class in any order that may replace it)."*

Given the above, there will be no loss of B1 office floor space and the proposal will allow for a local business expansion and employment generation - economic development is a key factor in the objectives of achieving sustainable development. I would therefore welcome your further thoughts on the application. Also if you require any additional information relating to the proposed business operation then please do not hesitate to contact me.

### 4) Need for the Health Clinic

The proposal allows for a local successful business to expand and diversify into the area, for which they have a presence in many other London Boroughs. This is supported by local and national policy. The proposal is also for a health and community use which again has local and national policy support. On a more local level the practice will assist in addressing health inequalities plays an important role.

The applicant has given the following information to support the need of the clinic in Camden:

- Demand for private GPs is rising fuelled by an average 2 week wait to see an NHS GP;
- LDC has seen over 135k patients since its inception;
- LDCs existing Kings Cross clinic sees around 500-560 patients each month (July 559 patients, August 470 patients, September 540);
- Approximately 65% of appointments are booked for the same day;
- Around 35% of our patients use LDC more than once;
- The majority of patients use LDC because of the flexibility and convenience they offer, allowing a trip to the clinic to fit around busy schedules;
- Some of LDC's patients are commuters, who live outside of the Borough and work a significant distance from their registered NHS practice. This allows them to see



an LDC doctor during the day instead of taking time off work for an appointment at their local surgery;

- LDC treat minors and see many children whose anxious parents are unable to get them a timely NHS GP appointment;
- LDC provide a service to overseas visitors, including forgotten prescriptions, referrals from a travel insurer;
- LDC support corporate and SME businesses in the delivery of their health and wellbeing strategies by providing GP services as an employee benefit. This covers physical as well as mental health, and they have their own on-site psychiatrist and a panel available for fast video consultations;
- LDC deliver the primary care element of health insurance on behalf of a large international insurer;
- LDC offer a broad range of services starting with standard 15 minute GP appointments with medications prescribed and dispensed by the doctor in the clinic so there is no need to make a separate trip to a pharmacy;
- LDC offer screenings, blood and urine tests, with test results in as little as 4 hours compared with a week on the NHS;
- LDC make fast referrals to consultants, which is particularly important for patients wanting to use private medical insurance for secondary care where a GP referral is required (e.g. orthopaedics, dermatology, physio, imaging, minor surgery etc);
- LDC have specialist arrangements with psychiatrists, muscular skeletal and imaging partners and can provide managed referrals and same day x-rays;
- A sizeable proportion of LDC work includes 'notary services' which includes fit to fly, fit to compete in sporting events and passport applications which the NHS does not provide for free;
- LDC has a sizeable business client portfolio, offering employee health and wellbeing services across a variety of industries, from financial to legal to IT. Servicing 25k employees, they provide clinic and video appointments that fits about the business and the employees.

It is considered that the proposed medical practice will be a significant asset to Camden and provided much needed services to local professionals and residents. I trust that this



additional information can be presented to the planning policy team and you can request a revised response accordingly.

Yours sincerely



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