

# Planning statement

Change of use of Room 1.4 from B1 to Dual B1/D1

Room 1.4, first floor (14 square meters)

344-354 Grays Inn Rd,

London,

WC1X 8BP

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## 1. Introduction

The purpose of this planning application is to change the use of Room 1.4 (14 square metres) at 344-354 Grays Inn Rd from B1 office use, to allow a D1 general practitioner consultation clinic to be operated by DocTap Ltd (<https://doctap.co.uk/>).

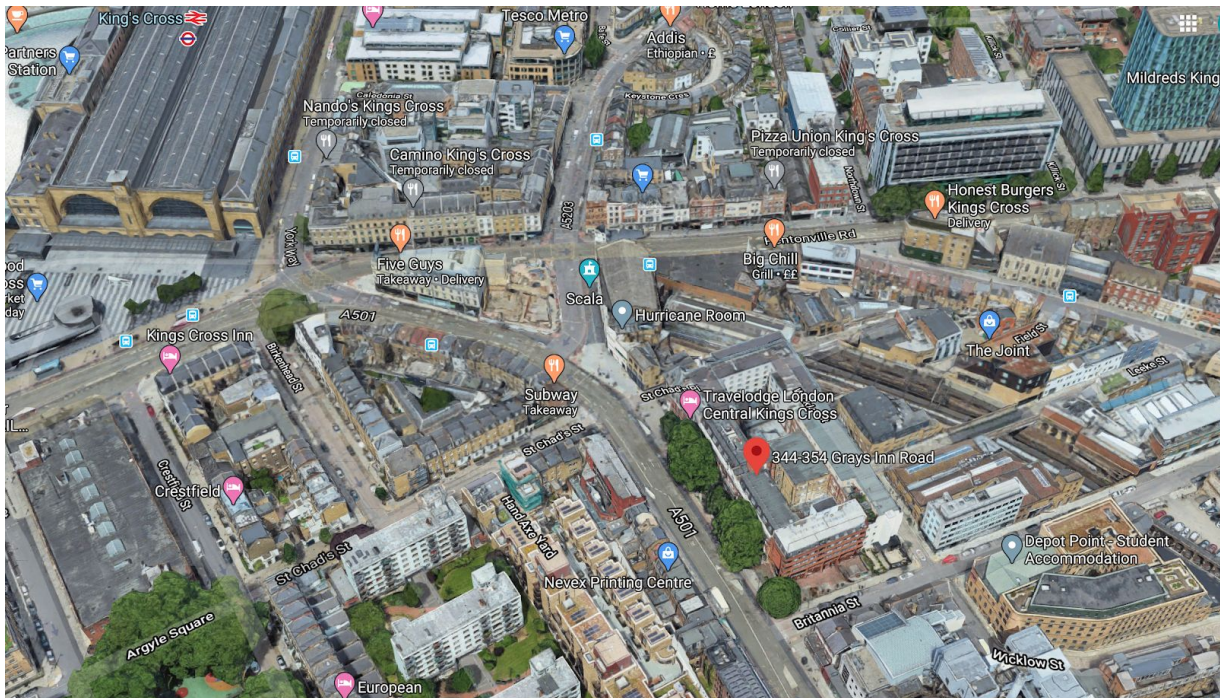
The proposed use is a "dual" use of B1/D1 to allow flexible use of the room, and to allow it to readily be reverted back to B1 (the original use) should this be necessary in the future.

DocTap provides affordable, convenient general practice consultations for diagnosis, treatment and general medical advice. DocTap Ltd employs fully trained specialist general practitioners.

### Proposal Site



## Site Location



## 2. Site context

### Local area

344-354 Grays Inn Rd is a business centre made up of serviced offices and meeting rooms. The building itself is a five storey office building, situated just south of Kings Cross Station. The building is accessed on the ground floor through a communal reception area. There are stairs and elevators to reach the upper floors.

The surrounding area has a variety of uses and character. Shops, cafes and restaurants make up much of the ground levels, with offices and largely commercial uses above.

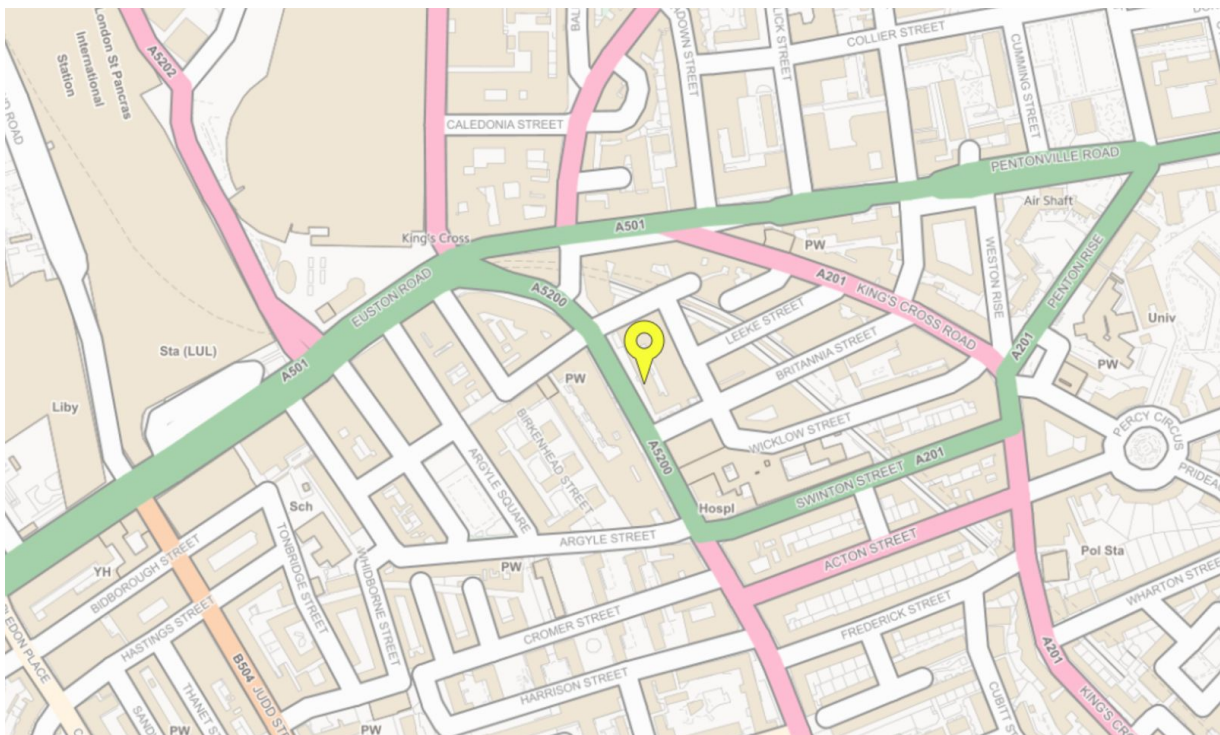
The site has excellent transport provision, a three minute walk from Kings Cross underground station and Kings Cross Station.

## Site designation

344-354 Grays Inn Rd is not a listed building. It is within Kings Cross / St Pancras Conservation Area, but does not require any external or internal alterations to the building.

## Flooding

National Planning Policy requires planning applications to be mindful of the risk of flooding. The Environment Agency's latest flood datasets show the site to be located within flood zone 1 (no risk).

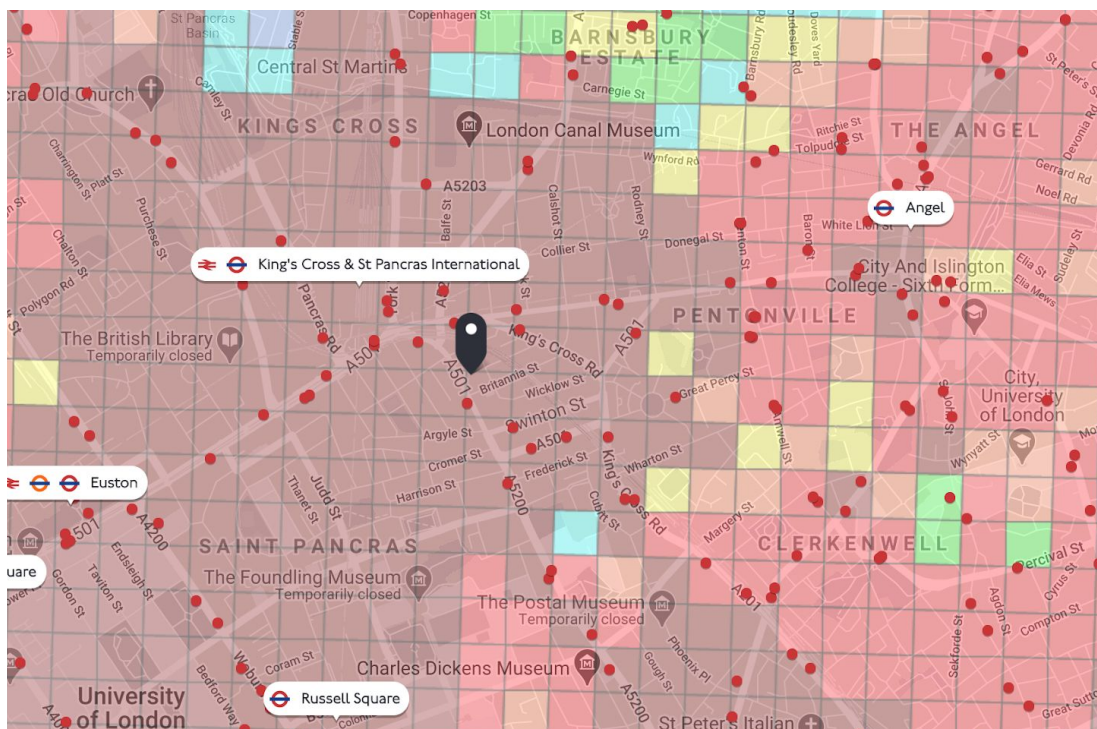


### PTAL map

The PTAL score provides a guide to how accessible a site is by public transport.

According to the PTAL WebCAT from Transport for London, the proposal site has a score of 6B (Best Score).

This is especially relevant for this application, as prospective patients would have a number of transport options available to them to reach the clinic.



## **Planning History**

Relevant applications in the immediate vicinity which should be considered as material consideration include:

### **Room 432 4th Floor Hamilton House - ref: 2017/3608/P**

Change of use of room 432 on the fourth floor from Class B1a office to a flexible use as Class B1 office or Class D1 medical clinic. GRANTED 2017.

### **344-354 Grays Inn Rd - ref: 2016/1098P**

Change of use from B1(office) to B1/D1 use (private GP office). GRANTED 2016.

### **1 Mabledon Place - ref: 2014/2942/P**

Change of use from flexible use within Classes A1/A2/A3 to flexible use within Classes B1/A1/A2/A3 of ground floor commercial unit. APPROVED 2014.

### **3. Proposal**

#### **Summary**

The proposal looks to change the use of Room 1.4 (14 square metres) to a dual B1/D1 use to allow the lawful operation of a general practitioner clinic by a successful growing business.

Many workers in London would like the convenience of seeing a GP near to where they work rather than having to take time off to see their GP where they live.

DocTap is a successful, growing business providing affordable, excellent, convenient GP services to people in central London.

DocTap has treated over 65,000 patients from its existing London clinics. Over 7500 patients have reviewed the service with 96% recommending it to friends and family. 15 minute face to face consultations start from £34, making convenient, excellent private GP care available to everyone.

The vast majority of DocTap patients have never previously used private healthcare. Patients range from office workers, the self employed, London residents, students and visitors. Please visit <https://doctap.co.uk/GP-Reviews> for a full list of every patient review.

Proposed opening times are:

- Monday to Friday: 08:30 - 18:30
- Saturday - Sunday : Closed

Patients will utilise the current means of access into the building from Grays Inn Rd.



### **How it works**

Patients book an appointment online and receive a confirmation email advising them to attend 344-354 Grays Inn Rd. Reception is automatically emailed a list of all patients so they know who to expect. Patients are directed to the reception on the ground floor where they are given a DocTap iPad on which to sign in. The receptionist advises them to take a seat in the reception area until they are called by the doctor.

The doctor can see when a patient has checked in (via the iPad) on their management screen. When the doctor is ready they will collect the patient and take them to their consultation.

There is ample space available at reception for patients waiting. Hence there will be no requirement for external or internal alterations to the building.

A single doctor will operate in the room at any one time.

### **Waste**

Clinical waste and sharps are stored in the room in specialist bins and will be emptied on a weekly basis or more frequently if required. All clinical waste and sharps will be disposed of by a specialist clinical waste collection company - SRCL. No clinical waste or sharps will be stored anywhere in the building other than in the appropriately labelled bins in room 1.4.

General waste and recycling is handled by the building's existing arrangements. The Care Quality Commission has reviewed our arrangements for managing clinical

waste, sharps and general waste and found that it complies with infection control standards.

### **Access**

- 344-354 Grays Inn Rd has step free access to the building.
- Room 1.4 is on the first floor and is accessible without stairs.
- There is an accessible WC facility within easy reach of the room.
- The room has been configured to allow unobstructed 1500mm wheelchair turning space.
- An emergency egress plan is in place.

### **The Future**

Only a single doctor will be practicing in the room at any one time. DocTap has no intention of expanding operations within this building. Should there be a desire to expand in the future, it would be carried out from additional premises, not by expanding the size of existing ones. In this way we would open up the service to a wider geographic market.

Hence the full extent of the request is for the use of a single 14 square metre room for GP consultations. No external or internal alterations will be required to the building either now or in the future.

## **4. Sustainable development**

The National Planning Policy Framework (NPPF) is concerned with promoting sustainable development in the UK. This states that there should be an automatic **presumption in favour of sustainable development.**

The NPPF puts heavy emphasis on looking at local needs, and promptly approving sustainable proposals. The NPPF identifies three components of a sustainable development:

- An Economic Role
- A Social Role
- An Environmental Role

The following tests have been made against each component:

### **Economic role**

The clinic provides employment for trained medical professionals and supporting staff. DocTap's unique offering of convenient, affordable and above all outstanding healthcare is in huge demand. With the dip in business confidence and investment brought about by the uncertainty over Brexit, the expansion of successful, local businesses should be encouraged.

By providing people in central London with fast, convenient access to healthcare, DocTap reduces absenteeism through people taking time off to wait for their home GP. By making healthcare so readily accessible, DocTap can improve productivity as patients are no longer put off visiting a GP.

The proposal will also make use of an empty office room.

### **A social role**

By providing high quality, convenient GP care, the clinic will improve the lives and health of people in the area.

Please take a moment to read what people are saying about DocTap on our website, Google and Facebook. When people are unwell, getting better is practically the only thing many people can think of. Yet getting to see a qualified doctor can be impossibly difficult. The level of affection and passion people have for DocTap at our existing clinics is astonishing. It would be a pleasure to be able to help people in this area of the City in the same way.

### **An environmental role**

The site is in a very accessible location, reducing traveling for people who work in the area and require the service.

The proposal is to make use of existing premises. The re-use of commercial premises for alternative mixed uses with positive benefits should be supported.

## **5. Planning Policy Assessment**

### **Camden Local Plan**

C1 concerns improving the health and well-being facilities within Camden. It seeks to ensure that "development in Camden considers local issues relating to health and wellbeing at an early stage of the planning process in order to positively improve outcomes for the people who live, work and visit the borough." C1 also states that the council will "support the provision of new or improved health facilities, in line with Camden's Clinical Commissioning Group and NHS England requirements".

E2 seeks to limit change of use from employment space to non-business use, unless certain criteria are met. This application proposes a dual use to allow the unit to return back to a B1 office at the time that DocTap leaves the site. Therefore, no current or future occupiers of the building will be adversely affected.

DocTap is looking to invest in the local area by providing essential, highly sought after services for both workers and residents in the area. The business will bring employment to the local area as well as footfall to the immediate vicinity from nearby parts of London.

DocTap will be making effective use of empty office space, whilst not reducing the space available for employment.

A report (Business Premise Study 2011) was commissioned by the London Borough of Camden to look at the availability of employment space. It finds that there is no shortage of office space in the Borough in either the short or long term. Additionally, current uncertainties in the UK and London economies make it all the more pressing to support successful small businesses.

## **London Plan**

The London Plan recognises that a growing London population is likely to support an expanding economy, and that it will give rise to a growing demand for healthcare and related services.

Policy 2.13 says it looks to: "...optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses."

Policy 2.12 states 'Borough's should enhance and promote the unique international, national and London wide roles of Central Activity Zones (CAZ), supporting the distinct offer of the Zone based on a rich mix of local as well as strategic uses.'

Policy 2.11 (g) specifies that the plan is looking to:

'Ensure development complements and supports the clusters of other strategically important CAZ uses including legal, health, academic, state and 'special' uses while also recognising the mixed nature of the CAZ.

The mayor's plan states under policy 4.2 of the London Plan:

*The Mayor will and boroughs and other stakeholders should support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises.*

The London Plan, along with other local policies looks to encourage and protect appropriate mixed use of the area, including local services and healthcare.

### **National Planning Policy Framework (NPPF)**

The National Planning Policy Framework (NPPF) consists of Government guidance on Planning Policy, to which local planning authorities are required to adhere. The NPPF outlines a number of 'core planning principles'.

- Not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve places in which people live their lives
- Proactively drive and support sustainable economic development
- Seek to secure a good standard of amenity for all existing and future occupants of land and buildings
- Encourage the effective use of land by reusing land that has been previously developed (brownfield land)
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling
- Take account of and support local strategies to improve health, social and cultural wellbeing for all

The proposed development meets all of these core principles by efficiently and effectively making use of an existing office unit for the benefit of local health, residents and workers.

Alongside these principles, chapter 8 of the NPPF focuses on supporting healthy communities. The D1 use of this proposal will assist in this regard.

## **6. Conclusion**

It is believed that this proposal is in line with local and national planning policy and meets the aims of sustainable development.

The application will allow for a successful, modern and growing business to expand to reach more patients, benefiting those living and working in the area and promoting a sustainable mix of uses.

The proposal will provide high quality, convenient medical services to people in the area. People working in the area will need to take less time off work. Fewer people will delay seeing a doctor, meaning faster diagnosis and treatment. Local businesses will benefit from reduced absenteeism and healthier staff.

The change of use will not in any way alter the operation of the unit. There will be no external alterations and patients will make use of the existing access. It will make use of a currently empty office room.

There is recent precedent for similar changes of uses in the immediate vicinity.

A single small 14 square metre room made available for dual B1 / D1 use would not lead to a material loss of office space in the area. In return it would provide a valuable service to other office users in the area and lead to a net increase in office productivity.



Planning statement - Change of use B1 to Dual B1/D1 - Rm 1.4, 344-354 Grays Inn Rd, WC1X 8BP

Based on the points raised in this document, I respectfully request that planning permission be granted.