

For official use only (date received): 16/12/2020 16:55:46

The Planning Inspectorate

ENFORCEMENT NOTICE APPEAL FORM (Online Version)

WARNING: The appeal **must** be received by the Inspectorate **before** the effective date of the local planning authority's enforcement notice.

Appeal Reference: APP/X5210/C/20/3265377

A. APPELLANT DETAILS

Name	Mr Scott Knight
Company/Group Name	Knights In London Ltd
Address	Knights In London 49 Tottenham Court Road LONDON W1T 2EG
Phone number	[REDACTED]
Email	[REDACTED]
Preferred contact method	Email <input checked="" type="checkbox"/> Post <input type="checkbox"/>

A(i). ADDITIONAL APPELLANTS

Do you want to use this form to submit appeals by more than one person (e.g. Mr and Mrs Smith), with the same address, against the same Enforcement notice? Yes No

B. AGENT DETAILS

Do you have an Agent acting on your behalf? Yes No

C. LOCAL PLANNING AUTHORITY (LPA) DETAILS

Name of the Local Planning Authority	London Borough of Camden
LPA reference number (if applicable)	EN20/0861
Date of issue of enforcement notice	05/11/2020
Effective date of enforcement notice	17/12/2020

D. APPEAL SITE ADDRESS

Is the address of the affected land the same as the appellant's address? Yes No

Address Knights In London
49 Tottenham Court Road
LONDON
W1T 2EG

Are there any health and safety issues at, or near, the site which the Inspector would need to take into account when visiting the site? Yes No

What is your/the appellant's interest in the land/building?

Owner

Tenant

Mortgagee

None of the above

Did you/the appellant occupy the land/building under a written or oral licence BOTH on the date the enforcement notice was issued AND on the date of making this appeal? Yes No

What is your/the appellant's involvement with the land/building?

Leaseholder.

I have also been a long-standing occupier of the upper portion of the building. Firstly as a commercial tenant (when the building was sub-divided into numerous small office-type spaces). I paid ever increasing 'rental' charges as my business needs grew and we took over more and more of the internal business space. Before finally becoming the sole tenant. I have therefore been in occupation - in a business capacity - since approx 2005. Albeit I was originally a tenant for many years - prior to entering into the current long-term Commercial Lease.

E. GROUNDS AND FACTS

Do you intend to submit a planning obligation (a section 106 agreement or a unilateral undertaking) with this appeal? Yes No

(a) That planning permission should be granted for what is alleged in the notice.

The facts are set out in

the box below

Following the growing demands & changing regulatory requirements of my rapidly growing Waste Management business - it became inevitable that I would need to relocate that particular business away from Tottenham Court Road - and into an Operating Centre that was fit for purpose. The subsequent relocation (first to Deptford - then to North Greenwich) left me with significant overcapacity in our Tottenham Court Road Office Space.

Separate from this - I had been dragged into a Court Case (brought by a disingenuous individual who was the employee of one of my long-standing business supply companies & a close personal friend). Originally the individual made a claim for injury he alleged he sustained while delivering janitorial items to our Offices - simply as a means to delay/ avoid an imminent disciplinary procedure. However with the abolition of a retirement age by UK Government - the claim suddenly became potentially worth £500,000+ My insurance company had wriggled off the hook in regards of liability (due to the late declaration of a potential claim). Leaving me facing financial ruin and the loss of 20+ years building up my different business interests. Fortunately my lawyers were able to organise several days of undercover filming that showed the claimant was in fact entirely able to walk over 1 mile to a local newsagents - unaided. Simply to purchase a newspaper. Before walking back home again. He had even

bought a new car just one week before our Court Case was due to begin in the High Courts. Not bad - considering that he stated under oath that he was in constant debilitating pain. As well as being unable to even straitened his legs due to only having minimum movement after his alledged knee injury at our premises.

The reason for including this lengthy pre-able is simply because i wish to make clear the reasons behind my strong reluctance to vacate any internal floor space within the building. Especially as remaining the sole occupier allowed us to secure the building & prevent any unauthorised or unaccompanied entry to anyone. Ensuring that I could never be put in the same position again.

Meanwhile rents continued to rise sharply all across London. Two senior female Office Staff regularly complained about how this soaring cost was leaving them short of disposable income. As well as how unsafe they felt as single women living in what I now know is termed a House of Multiple Occupancy (HMO). The large houses they lived in were normally over-capacity & full of transient or migrant workers that brought with them noise, disruption & even criminal activity.

This is when it occurred to me that their need might segment perfectly with the now empty office space I had. And so it was therefore decided that we would make some minor decorative changes - that would allow us to use the property as a suitable accommodation. The works began in 2014.

In reality our then Washroom Services Manager - Blanka Guillen's father became seriously unwell. Which forced her to make the tough decision to go live in Mexico City. In order to be able to provide essential care for him. This left only one member of Staff - Mariya Todorova - wishing to live in 49 Tottenham Court Road. She had also progressed significantly through the company and had also decided that she no longer wanted to share with anyone else.

As my businesses continued to flourish & grow - I decided to carry out far more extensive refurbishment works than i had originally intended. Largely because as we peeled back the layers we discovered that most of the preceding building work had been done to a shocking - and certainly unacceptable by modern day building regulations/ standards. I dont wish to sound derogatory to the Landlords. But it quickly became clear to me that if I wanted to achieve a satisfactory end result. Then I would need to invest far more time, money & resource in order to achieve it.

Mariya lived at the property continuously from 2015-2020. A fact to which she is more than happy to testify to. However due to the ongoing effects of Coronavirus - Mariya remains furloughed. We therefore need to ask for some more time to be provided required - in order for a signed affidavit to be drawn up & submitted to support this application

For the purposes of clarity - after Mariya's subsequent departure - her self-contained apartment has been operating as a Serviced Accommodation business. Something that ultimately led us to where we are today.

I am also most willing to submit photographic evidence (dated independently by mobile network providers). As well as Invoices from Building Company & other documents associated with the extensive building & redecoration works carried out back in 2014/15. However this has so far been thwarted by the on-going effects of the Coronavirus epidemic. Not least because all business archives are currently stored at our Vending Depot in the Isle of Sheppey, Kent. Which as you will likely already be aware has seen an exponential rise in recent Covid Cases leading to a spike sufficient to place it grimly in second place for new Covid infections across the entire UK.

I stand ready & willing to provide this substantive proof that the works were completed by absolute latest 2015. Albeit that further minor internal works have continued up to current day (ie - existing internal shower-room door & 2small adjoining storage cupboard doors have been replaced with newly commissioned Crittall-effect steel doors & reeded glass inserts - to mirror the actual Crittall Windows to the front elevation. Similarly - I am in a position to ably demonstrate the upper floors have been in constant occupation. As well as being used as a domestic dwelling continuously since at least early 2015. However I must once again ask that more time be granted. In order for me to have adequate and safe access to our archives once Coronavirus infections subside to an appropriate level.

(b) That the breach of control alleged in the enforcement notice has not occurred as a matter of fact.

(c) That there has not been a breach of planning control (for example because permission has already been granted, or it is "permitted development").

(d) That, at the time the enforcement notice was issued, it was too late to take enforcement action against the matters stated in the notice.

(e) The notice was not properly served on everyone with an interest in the land.

(f) The steps required to comply with the requirements of the notice are excessive, and lesser steps would overcome the objections.

(g) The time given to comply with the notice is too short. Please state what you consider to be a reasonable compliance period, and why.

F. CHOICE OF PROCEDURE

There are three different procedures that the appeal could follow. Please select one.

1. Written Representations

(a) Could the Inspector see the relevant parts of the appeal site sufficiently to judge the proposal from public land? Yes No

(b) Is it essential for the Inspector to enter the site to check measurements or other relevant facts? Yes No

Please explain.

If the Inspector wishes to verify the high quality of work - as well as our strict adherence to current building regulations - then an internal site visit would likely be necessary.

2. Hearing

3. Inquiry

G. FEE FOR THE DEEMED PLANNING APPLICATION

1. Has the appellant applied for planning permission and paid the appropriate fee for the same development as in the enforcement notice? Yes No

2. Are there any planning reasons why a fee should not be paid for this appeal? Yes No

If no, and you have pleaded ground (a) to have the deemed planning application considered as part of your appeal, you must pay the fee shown in the explanatory note accompanying your Enforcement Notice.

H. OTHER APPEALS

Have you sent other appeals for this or nearby sites to us which have not yet been decided? Yes No

I. SUPPORTING DOCUMENTS

01. Enforcement Notice:

see '[Appeal Documents](#)' section

02. Plan (if applicable and not already attached)

see '[Appeal Documents](#)' section

J. CHECK SIGN AND DATE

I confirm that all sections have been fully completed and that the details are correct to the best of my knowledge.

I confirm that I will send a copy of this appeal form and supporting documents (including the full grounds of appeal) to the LPA today.

Signature

Mr Scott Knight

Date

16/12/2020 16:56:27

Name

Mr Scott Knight

The gathering and subsequent processing of the personal data supplied by you in this form, is in accordance with the terms of our registration under the Data Protection Act 2018. Further information about our Data Protection policy can be found on our website under Privacy Statement.

K. NOW SEND

Send a copy to the LPA

Send a copy of the completed appeal form and any supporting documents (including the full grounds of the appeal) to the LPA.

To do this by email:

- open and save a copy of your appeal form
- locating your local planning authority's email address:
<https://www.gov.uk/government/publications/sending-a-copy-of-the-appeal-form-to-the-council>
- attaching the saved appeal form including any supporting documents

To send them by post, send them to the address from which the enforcement notice was sent (or to the address shown on any letters received from the LPA).

When we receive your appeal form, we will write to you letting you know if your appeal is valid, who is dealing with it and what happens next.

You may wish to keep a copy of the completed form for your records.

L. APPEAL DOCUMENTS

We will not be able to validate the appeal until all the necessary supporting documents are received.

Please remember that all supporting documentation needs to be received by us within the appropriate deadline for the case type. If forwarding the documents by email, please send to **appeals@pins.gsi.gov.uk**. If posting, please enclose the section of the form that lists the supporting documents and send it to Initial Appeals, Temple Quay House, 2 The Square, Temple Quay, BRISTOL, BS1 6PN.

You will not be sent any further reminders.

Please ensure that anything you do send by post or email is clearly marked with the reference number.

The documents listed below were uploaded with this form:

Relates to Section: SUPPORTING DOCUMENTS
Document Description: 01. The Enforcement Notice.
File name: Doc 13 Mar 2020, 1513.pdf

Relates to Section: SUPPORTING DOCUMENTS
Document Description: 02. The Plan.
File name: Doc 16 Dec 2020, 1636.pdf

Completed by MR SCOTT KNIGHT

Date 16/12/2020 16:56:27