

PLANNING and ACCESS CONSIDERATIONS STATEMENT

4 -5 Coleridge Gardens NW6 3QH

Change of use to D1 (education)



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A S S O C I A T E S
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1.0 Preamble

- 1.1 4-5 Coleridge Gardens is a 2 storey office building in Coleridge Gardens.
- 1.2 Coleridge Gardens is a private no-through road or yard (sometimes described as a mews) off Fairhazel Gardens and parallel to Belsize Road.
- 1.3 This statement accompanies a planning application proposing the change of use of the property to education, Use Class D1.
- 1.4 The application does not propose any changes to the external appearance of the building
- 1.5 Section 42 of the Planning and Compulsory Purchase Act 2004 introduced a new section 62 to the Planning Act 1990 which requires that a statement covering design concepts and access issues is submitted with all applications for planning permissions except those proposing engineering, works to dwellings (outside of conservation areas) or change of use.
- 1.6 This application is for change of use and therefore a design and access statement is not statutorily required.
- 1.7 Nevertheless it is anticipated that the Borough Council will request a statement.
- 1.8 The statement also reviews the relevant planning history and planning policies.
- 1.9 The procedural requirements are set out in The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2006 but DCLG Circular 01/2006 explains that statements should be proportionate to the complexity of the application, but need not be long.
- 1.10 This is a minor application and therefore it is appropriate that the statement is relatively short.

2.0 The location

- 2.1 As noted above, the site is in Coleridge Gardens which is a private no-through road or yard (sometimes described as a mews) off Fairhazel Gardens and parallel to Belsize Road. The access is between two of the shops fronting Fairhazel Gardens.
- 2.2 The site is within the Swiss Cottage Conservation Area.
- 2.3 Coleridge Gardens appears to have started as a 'backland' industrial or similar use, possibly occupied by a builder or small trader of some sort or even stabling (livery yards were necessary in Victorian suburbs). Such small industrial premises are common in the Victorian and Edwardian suburbs.
- 2.4 Coleridge Gardens is aligned roughly on an east west axis with a 2 storey building along the north side and a slightly smaller building on the south side. There is a narrow roadway between the two used for parking with a pedestrian route through.
- 2.5 The application site is at the west end of the yard. The building is full width across the site which then tapers towards the west end, the application building therefore also tapering.
- 2.6 The building is on 2 floors and the internal floor area is understood to be about 510m² gross. There is no allocated parking and no space for off street servicing, loading or unloading.
- 2.7 The interior of the building has been extensively partitioned to create small offices and it is understood that the building was last used as a 'business centre' occupied by various small firms but the building is now vacant and has become hard to let. Attached at appendix A is a letter and enclosures from the letting agent, Simon Lewis explaining that the property has been offered both as a whole and as small units with no takers.
- 2.8 The other buildings in Coleridge Gardens are also used as offices.

3.0 The proposal

- 3.1 The proposal is change of use to an educational establishment to be run by a new private educational establishment known as 'New World College Ltd'.
- 3.2 The College will be run will be run by a team of lecturers headed by Mr Edmund Etrey. Mr Etrey jointly owned and ran Unity College, an Independent College of Further Education, with his late wife. During that period Unity College had accredited status conferred by The British Accreditation Council (BAC) for Independent Further and Higher Education which confirms the standard of education.
- 3.3 The New World College will aim to achieve a similar standard. The College will have 12 academic staff (full or part time) with a full time administrative staff of 3 – 4 people
- 3.4 A range of courses will be offered. The courses will generally be of 36 weeks duration and will focus on business related subjects such as marketing, accountancy, IT and personnel management.
- 3.5 The courses will be primarily at level 3 and above of the National Qualifications Framework - Diplomas and Advanced/Higher Diplomas – which can then be 'topped up' by additional study to gain a relevant general or an honours degree. The courses are therefore both course in their own right and part of a path to higher academic achievement.
- 3.6 Students accepted onto the courses will normally have the specified numbers of GCSE and A-Level passes or their equivalents.
- 3.7 New World College are confident of being granted accreditation by the relevant accrediting and professional bodies on the basis of their lecturers CV's and other supporting documents such as course outlines, college prospectus, staffing details, student enrolment and welfare services etc
- 3.8 The total number of students will be 500 (full-time). These will hail predominantly from outside Europe but the college also expects to enrol from the local community,

including minorities, seeking to train/retrain to enhance their employments prospects. The latter may opt for day-time part-time courses since they may be out of work. The age range of students will generally be between 18 and 35 years.

3.9 Total Number of Students expected to attend the site on any one day is expected to be about 100. The teaching hours will be 0900 to 1800 hrs on weekdays, comprise 3 teaching sessions of 3 hours each. Seminars will also be held between 1100 and 1700 hrs on Saturdays, although fewer students are expected to attend on Saturdays, probably a maximum of 25.

3.10 The internal arrangement of the accommodation is not a planning matter as internal works do not of themselves require permission. The accommodation will probably be divided internally to provide 8 classrooms, a library, an IT lab, a staff room, and a general office. There will also be toilet facilities (including disabled provision) and ancillary accommodation. This will be decided once permission has been obtained.

3.11 Limited student facilities will be provided. It is not intended to provide a canteen or other refectory type service and there will be no social facilities. Tea and coffee making facilities will be provided and there will be vending machines but students will by and large be expected to make their own arrangements. This will doubtless benefit the cafes and coffee shops in the locality.

4.0 Social context.

4.1 The premises had no social function. The proposed use will have more social benefits in helping to provide a better trained workforce.

5.0 Economic context.

5.1 The previous use as office suites might have been expected to give rise to perhaps 30 office jobs but the evidence from the letting agent is that the suites were not of interest to small companies. The job creation was therefore only theoretical.

5.2 The premises are not considered suited to industrial or storage use. The floor to floor heights are limited and there is no access for delivery vehicles. The roadway

of Coleridge Gardens is utilized for parking by the occupiers of the other buildings and delivery vehicles could get to the building to off-load.

5.3 Coleridge Gardens also offers no opportunity for delivery vehicles to turn around and they would have to reverse in (or out). This would be disruptive for the other occupiers of the Gardens.

5.4 The economic benefits of the proposal are considered in a later section

6.0 Policy context.

6.1 The Planning Acts requires that applications for planning permission be decided in accordance with the development plan unless the development plan is outweighed by other material considerations.

6.2 The development plan system is changing to a new system known as 'local development frameworks' (LDF) based on a 'core strategy' setting out key spatial considerations backed up by a number of other documents (site allocations document, development control policies etc) and 'supplementary planning documents' (design, standards etc).

6.3 Under the 2004 Act, old style local or unitary plans ceased to be of full effect from September 2007 (or 3 years from the date of adoption if later). However, where the new LDF is not yet in place policies can be 'saved' – will still apply - by a direction from the Secretary of State.

6.4 The Camden UDP was adopted in 2006 and therefore expired in 2009. However, the Secretary of State has issued a direction allowing many of the policies to be saved.

6.5 Saved Policy E2 of the adopted UDP states

E2 - Retention of existing business uses

The Council will not grant planning permission for development that involves the loss of a business use on a site where there is potential for that use to continue. The Council will consider:

- a) whether the site is in or adjacent to the Industry Area;

- b) the size of the site and whether it could potentially provide for servicing by large vehicles;
- c) whether the site is particularly suitable for small firms;
- d) the accessibility of the site by public transport and by service vehicles;
- e) the relationship of the site to nearby land uses;
- f) the demand, supply and variety of sites that are suitable for employment uses, firstly in that particular use class, and secondly in business use in general, and
- g) the retention of design features that enable flexible use, including use for light industry as part of schemes for the redevelopment or alteration of industrial premises for B1 purposes.

Where the Council considers that the site does not have potential for continuation of the existing business use, preference will be given to maintaining the site in an alternative business use, with a higher priority to retention of flexible space for B8 or B1 light industry than to provision of B1(a) offices. When a site is not suitable for continuation of any business use other than B1(a) offices, as an exception to the general approach, the Council may allow a change to other uses. In such cases, the Council will seek a change to permanent residential uses (in particular affordable housing), or community.'

6.6 The Council have published a 'draft core strategy' of the new LDF which was formally submitted to the Secretary of State on the 28th January 2010.

6.7 Policy CS8 – promoting a successful and inclusive Camden economy - of the core strategy submission document advises that

The Council will secure a strong economy in Camden and seeks to ensure that no-one is excluded from its success. We will:

- a) promote a concentration of office growth at King's Cross with further provision in the other growth areas and Central London to meet the forecast demand of 615,000 sq m to 2026;
- b) support Camden's industries by:
 - safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers;
 - safeguarding the borough's main Industry Area; and
 - promoting and protecting the jewellery industry in Hatton Garden;
- c) encourage a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises, such as managed, affordable workspace;
- d) support local enterprise development, employment and training schemes for Camden residents;
- e) recognise and encourage the concentrations of creative and cultural businesses in the borough as well as supporting the development of Camden's tourism sector whilst ensuring that any new facilities meet the other strategic objectives of the Core Strategy;
- f) recognise the importance of other employment generating uses, including retail, leisure, education and health.

6.8 The policies are further considered in the considerations section below.

7.0 London Plan

7.1 The London Plan notes at para 1.42 that the fundamental factor driving change in London's employment structure in the last 20 years has been the gain of 546,000 jobs in financial and business services and the loss of 292,000 jobs in manufacturing.

7.2 It adds at para 1.59 that, in the emerging information society, London will need to become increasingly a learning city in which skills and the ability to use information will be essential. It notes that this will place heavy demands on education and training resources.

8.0 Approach to inclusion

8.1 Circular 01/2006 makes clear that internal accessibility is not normally a consideration in the determination of planning applications.

8.2 In addition, changes of use such as this do not require a formal access statement.

8.3 As may be expected of an older property, accessibility is currently poor. Access from the street is level but there are no disabled toilets. The corridors are relatively narrow with sharp turns and could be difficult for wheelchair users.

8.4 The continued use as offices would not therefore be inclusive.

8.5 The College appreciate that a high proportion of the population have special needs and they are aware of the benefits of inclusive design, not only for those studying or working in the building but for other visitors.

8.6 The College therefore recognise that the building will require extensive modification in association with the proposed educational use and the needs of the less able will be taken into account.

- 8.7 The fit out will follow current recommendations and practice. Finishes will be chosen to avoid both potentially slippery or wheel resistant surfaces. Signs will take into account the RNIB's guidance in 'Building Sight'.

9.0 Consultations

- 9.1 No pre-application consultation has been carried out.

10.0 Design principles.

- 10.1 The application does not propose any changes to the exterior of the building.
- 10.2 The issues specified in the Order to be addressed in a design statement - amount, layout, scale, landscaping and appearance - do not therefore apply.
- 10.3 The interior of the building is typical of an office building of the period, being largely open-plan subdivided by partitioning.
- 10.4 It is assumed that such partitioning can be removed and new partitioning used to create classrooms, study rooms etc.
- 10.5 Such internal works do not require planning permission (unless the external appearance is materially affected) and therefore does not give rise to any issues.

11.0 Transport accessibility

- 11.1 Public transport accessibility is an increasingly important consideration for planning authorities, particularly for uses such as this that may attract large numbers of people.
- 11.2 Transport accessibility in London is normally assessed on the basis of Public Transport Accessibility Level or PTAL. This is based on tube and train services within 960 metres and buses within 640 metres. The variables are then distance to the service and the frequency in the peak hour, which is taken as 08.15 to 09.15.

- 11.3 The site is approximately 170 metres from South Hampstead train station which has a scheduled service of 6 trains per hour into London Euston in the morning peak.
- 11.4 The site is 580 metres from Swiss Cottage Underground Station which is served by Jubilee Line trains with trains scheduled to arrive every 2 – 6 minutes.
- 11.5 The site is also 675 metres from Finchley Road station which is served by the Metropolitan Line with services again scheduled at 2 - 6 minute intervals in the peak hour. Jubilee Line services also stop at Finchley Road but are not counted twice for the purposes of the PTAL assessment. Some staff and students will obviously prefer to use that station to access the Jubilee Line.
- 11.6 Bus route 31 passes along Belsize Road within 200m of the site. The route is scheduled to run every 5 – 8 minutes.
- 11.7 Bus routes 13 (every 6 -10 minutes) , 46 (every 6 – 9 minutes), 82 (every 5 – 9 minutes), 113 (every 7 – 11 minutes) and 187 (every 8 – 11 minutes) stop in Finchley Road about 500 metres from the site.
- 11.8 There are further bus routes outside the PTAL limits but still within reasonable walking distance, for example, along Abbey Road/West End Lane which is within 800metres.
- 11.9 The PTAL level has not been calculated but on the basis of the above is assumed to be good or better.
- 11.10 Accessibility is unaffected by the proposal.

12.0 Considerations

- 12.1 The building is 2 storey building last used as service offices. It is of poor standard with no off street servicing and has proved hard to let.
- 12.2 If we look first of the criteria of UDP policy E2.

- 12.3 Criterion A, proximity to the Industry Area. The site is not in or close to the designated Area
- 12.4 Criterion B, size of site and servicing by large vehicles. The site is limited and cannot be served by large vehicles.
- 12.5 Criterion C, suitability for small firms. The site is suitable for small office firms but is of very poor standard. There is no parking and on-street parking is limited both in number and in duration.
- 12.6 Criterion D, accessibility. The site is reasonably accessible but it is also accessible for the proposed use.
- 12.7 Criterion E, relationship to nearby uses. The remainder of the gardens is occupied by small firms and there is reasonable separation from the neighbouring houses
- 12.8 Criterion F, demand and supply. Appendix A includes evidence that demand for the premises is weak.
- 12.9 Criterion G, flexible use and suitability for light industry. The site is not suited to industry.
- 12.10 It will be seen therefore that the existing office use meets many of the criteria relating to whether the change of use should be allowed. Under policy E2 change of use is possible.
- 12.11 Policy CS8 of the core strategy gives other criteria. The Core Strategy seeks to concentrate office growth at Kings Cross and other parts of central London and beyond that states that the Council will support Camden's industries by 'safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers' particularly in the borough's main Industry Area; and in Hatton Garden;
- 12.12 The application site does not meet the needs of modern industry

- 12.13 The Core Strategy does go on to say that the Council will encourage a mix of employment facilities, including facilities suitable for small and medium sized enterprises, such as managed, affordable workspace, but also recognises ‘ the importance of other employment generating uses, including retail, leisure, education and health. ‘
- 12.14 This proposal is of course for education.
- 12.15 The main objectives of both the existing and emerging policies is clearly to protect accommodation that is suitable for the needs of modern industry or otherwise important to protect employment. These premises are of marginally suitably for employment.
- 12.16 On the other hand however they are suited to the proposed use. The premises are readily accessible for students with town centre services – restaurants, shops etc – within walking distance. The use will not be carried on outside of normal hours and does not have a bar or ‘students union’ that would provide a focus for social activity. There is therefore no conflict with residential amenity.
- 12.17 The London Plan recognises the importance of education and training for London and notes at para 1.59 that London will need to become increasingly a learning city in which skills and the ability to use information will be essential.
- 12.18 The change of use of the building will not greatly affect the supply of offices while offering benefits in terms of training opportunities.
- 12.19 In addition, the proposed training use will in itself create a number of jobs, with perhaps 4 – 6 support staff and 12 academic staff. This is about half the number that might be expected from an office based activity but is still significant.
- 12.20 The students will also benefit the immediate area by patronising the local shops and cafes.
- 12.21 The location is as noted readily accessible by public transport. The students would be expected to use public transport and all students and staff will be supplied with information on public transport and how to get to the site.

12.22 Cycle parking will be provided in order to encourage cycling.

13.0 Conclusion

13.1 This is a relatively minor proposal for the change of use of a vacant building to a school offering training in accountancy and related business subjects.

13.2 The London Plan recognises the importance of London becoming a 'learning city' and the importance of the office sector. The proposed use supports London's key role.

13.3 The UDP policy E2 protects employment buildings but allows for exceptions where the building is not suited or demand is poor. The proposal meets those criteria

13.4 Draft Core strategy policy CS8 similarly allows for the change of use of employment buildings that do not meet the needs of modern industry and goes further in recognising that education is itself an employment generating use.