

Planning Statement

In respect of

Former Fitness First
The Old Heating Station
Coram Street
London
WC1N 1HB

On behalf of

The Gym Limited

RPS CgMs Ref: JCG17215

June 2017

Secure & Stable
ADDING VALUE

QUALITY MANAGEMENT

Prepared by:	Fred Woodrow
Authorised by:	Matthew Brewer
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1.0 INTRODUCTION

- 1.1 The Gym Ltd (the Applicant) are proposing a 24 hour use of the existing single storey basement D2 (Leisure) unit at The Old Heating Station, Coram Street, WC1N 1HB (the Site) within the London Borough of Camden. The Gym has taken over the operation of these premises from Fitness First in order to maintain a leisure facility in the centre.
- 1.2 This Planning Statement has been prepared in support of the variation of condition 1 of planning permission PS9704920R2, relating to the opening hours of the health and fitness club / gymnasium for “The Gym”. The current conditions restrict operational hours between 06:00 - 23:00 Monday to Friday, 07:00 – 22:00 Saturday and 08:00 – 22:00 on Sundays and Bank Holidays.
- 1.3 The Gym Group has built a successful business model operating 24 hour health and fitness uses, and therefore, has considerable experience in ensuring that their units operate efficiently and without disruption. The Gym are an experienced operator with over 90 gyms operating across the country at present, including premises in Birmingham, Cardiff, Glasgow, Leicester, Liverpool, Manchester, Nottingham and Sheffield, and 26 premises in London, including operations within residential buildings in Angel, Colindale, Stockwell, and West Hampstead.
- 1.4 The Gym aims to increase access to health and fitness activities to a wide demographic to encourage and improve health by providing a low cost and flexible gym membership option. The Gym provides a high quality but cheaper option for health and fitness activity, with 24hr opening hours providing flexibility for its customers.
- 1.5 The Gym provides a health and fitness use which is aimed at a different market to the current offer typically within the area. The Gym aims to increase access to health and fitness activities to a wide demographic to encourage improved health by providing a low cost and flexible option. On average 35% of The Gym’s members have not been to a gym before, with The Gym attempting to provide its facilities to a much wider market.
- 1.6 Membership of The Gym is at low cost, with no minimum contract period. As such members can join for just a single month, or have a break within their membership at nominal cost. The Gym opens on a 24 hour basis to ensure flexibility of use by its members, whilst of critical importance is ensuring that the amenity of surrounding occupiers is not unduly affected.
- 1.7 This Planning Statement sets out the site and surrounding area, the planning history of the site, the key planning policies which the proposed development needs to be considered against and the planning considerations of the application.
- 1.8 A letter has been produced by Clarke Saunders Acoustics in support of the planning application and should be read in conjunction with the supporting plans.

2.0 SITE AND SURROUNDING AREA

- 2.1 The application site is a single storey metal framed structure with glazed elevations, sited at the eastern end of a strip of land surrounded by Coram Street to the north, Herbrand Street to the west, Marchmont Street to the east and the access road to the Bloomsbury Hotel to the south. It provides pedestrian access from street level to the basement, where the gym use is located.
- 2.2 The gym is a car free development although car parking within the area, associated with the site is located adjacent to the north, with an NCP car park on Brunswick Square at the rear of the site, which serves a number of facilities in the local area.
- 2.3 The surrounding area contains a mix of residential and commercial/employment uses. The site is not located within a Town Centre but is located within the Central London Area, with a number of surrounding buildings comprising commercial uses at ground floor level, with a mix of uses above.
- 2.4 In terms of accessibility, the site has a Public Transport Accessibility Level (PTAL) of 6b (Excellent), and is readily accessible by a variety of public transport modes, providing easy and quick access from around the surrounding area to and from the site. This includes Russell Square Underground Station and London Euston Station within 5 minutes walking distance of the site.

3.0 PLANNING HISTORY

- 3.1 As detailed on Camden Council's online planning search, the Site has been subject of a number of planning applications. The most relevant applications to this current proposal have been outlined below.
- 3.2 In 2015, planning permission (2015/4176/P) was granted for *'temporary removal of condition 1 (hours of operation) of planning permission PS9704920R2 dated 17/04/1998 as varied by planning permission PSX0104075 dated 13/03/2001 (Change of use to a gym) namely to allow 24-hour use of the premises for a period of 12 months'*. The permission allows a 12 month temporary permission and enables the Council to fully assess the impacts of the proposal on the surrounding area. The informatives stipulated *'planning permission was granted for the change of use from a heating station to a health and fitness club on 17/04/1998 (planning ref: PS9704920R2). Condition no.1 of this planning permission controlled the hours of operation from 0700 to 2100 Mon-Sat with no operation of the unit allowed on any other day. This condition was subsequently varied on 13/03/2001 (planning ref: PSX0104075) to extend the hours of operation as follows; 0600 to 2300 Mon-Fri, 0700-2200 on Sat and 0800-2200 on Sundays and Bank Holidays. The information submitted with this current application was considered to be adequate to demonstrate that the proposed extension of the operating hours would be appropriate for a period of 12 months. As such the temporary removal of condition no.1 of planning permission PS9704920R2 is considered acceptable. At the end of the 12-month period, the Council will be able to fully assess the impacts of the proposal on the surrounding neighbourhood'*.
- 3.3 In 2001, planning permission (PSX0104075) was granted for *'variation of condition 1 of planning permission dated 17th April 1998 (ref. No. PS9704920R2) to extend the hours of operation as follow; 06.00 hours to 23.00 hours Monday to Friday, 07.00 hours to 22.00 hours Saturday and 08.00 hours to 22.00 hours Sundays and Bank Holidays'*.
- 3.4 In 1998, planning permission (PS9704920R2) for *'change of use from heating station to health and fitness club, and the erection of a glazed pavilion, as shown on drawing number 6.96 (received 20th March 1998), and letters dated 21st January 1998 and 19th March 1998'*. Condition 1 stipulated *'the use hereby permitted shall not be carried out outside the following times 07.00 to 21.00 Monday to Saturdays. It shall not be carried out at any time on Sundays or Bank Holidays'*.
- 3.5 The current proposed development, discussed in greater detail in the section below, proposes a variation to the relevant condition of both of the above planning permissions. This is to enable operation of 'The Gym' facility 24 hours a day.

4.0 PROPOSED DEVELOPMENT

- 4.1 The application proposes the variation of existing conditions to enable The Gym to operate the basement unit for 24 hours a day, seven days a week with these hours of operation. The description of development is therefore detailed below:

“Variation of Condition 1 of 2015/4716/P to allow for a permanent 24 hour operation of the gym unit”.

- 4.2 The wording of condition 1 of planning permission 2015/4176/P states that:

“For the purpose of this decision, condition no.1 of planning permission PS9704920R2, dated 17 April 1998 as varied by PSX0104075 dated 13 March 2001, shall be removed for a period of 12 months starting from the date of this decision notice”.

- 4.3 Following the successful variation of condition 1 of planning permission 2015/4176/P, the gym use was allowed to operate on a 24-hour basis for a temporary period of 12 months.
- 4.4 As the temporary planning permission on 28 October 2016, a new permission is required to enable the future operators, The Gym, to operate from the premises on this basis.
- 4.5 The Gym aims to increase access to health and fitness activities to a wide demographic to encourage improved health by providing a low cost and flexible gym membership option. The extended hours will provide appropriate flexibility for members and encourage greater activity and fitness within this accessible London location within the CAZ.
- 4.6 The Gym provides a high quality but lower cost option for health and fitness activity. A key component of The Gym’s operation and offer to its members are its opening hours and the flexibility which they allow to members.
- 4.7 The Gym’s operations include a range of cardio-vascular (rowing, running, cycling, etc.) and resistance (weights) equipment for individual use. No studios or dance floor areas will be provided. As such there are no intensive activities undertaken as part of the operation and music will be limited to provide controlled low-level background music only.

5.0 PLANNING POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.
- 5.2 In this instance, the Development Plan consists of:
- The London Plan (2016);
 - Camden Core Strategy (2010);
 - Camden Development Policies (2010).
- 5.3 The emerging Camden Local Plan Submission Draft (2016) is given material weight, as the Cabinet has referred the adoption of the Local Plan to the meeting of the Council on 26 June 2017. The document will eventually replace the Core Strategy and Development Policies once adopted.
- 5.4 The National Planning Policy Framework (NPPF) (March 2012), which sets out the Government's planning policies for England and how these are to be applied, and the National Planning Practice Guidance (NPPG) (March 2014) are also material considerations.
- 5.5 The following section sets out the relevant planning policy context to which the proposal should be assessed against.

National Planning Policy Framework

- 5.6 The NPPF includes a requirement on local planning authorities to plan positively for growth and states that *"It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability"*. Moreover *"planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities"*.

The London Plan (2016)

- 5.7 At the regional level of planning policy, the Greater London Authority (GLA) adopted the London Plan Consolidated within Alterations in March 2016 which forms part of the Development Plan for Brent.
- 5.8 The relevant policies of the London Plan are:
- 3.2 – Improving health and addressing health inequalities
 - 7.1 – Lifetime neighbourhoods
 - 7.4 – Local Character
 - 7.15 – Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes

Core Strategy (2010)

5.9 The London Borough of Camden's Core Strategy sets out a range of strategic objectives for each topic area which is underpinned by relevant policies.

5.10 The Core Strategy policies relevant to the proposed development are:

- CS5 – Managing Growth and Development

Development Policies (2010)

5.11 The London Borough of Camden's Development Policies provides guidance for managing development across the borough.

5.12 The policies relevant to the proposed development are:

- DP15 – Community and Leisure Uses
- DP16 – The Transport Implications of Development
- DP26 – Managing the Impact of Development on Occupiers and Neighbours
- DP28 – Noise and Vibration

Camden Local Plan (2016)

5.13 The emerging Camden Local Plan sets out a range of planning policies for managing development across the borough.

5.14 The draft policies relevant to the proposed development are:

- G1 - Delivery and Location of Growth
- C3 – Cultural and Leisure Facilities
- A1 – Managing the Impact of Development
- A4 – Noise and Vibration

6.0 PLANNING CONSIDERATIONS

6.1 In this section, consideration is given to the key issues raised by the scheme in relation to the planning policy context under the following headings:

- Principle of use
- Design and appearance
- Residential amenity
- Premises security
- Transport matters

Principle of use

6.2 The fitness / gym use of the basement unit is already established, given the previous planning permissions on the site. This current application seeks to extend operating hours of the premises in line with the 2015 planning permission granted for 24 hours use of this premises.

6.3 In planning policy terms, G1 states *'the council will create the conditions for growth to deliver the infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough'*. C3 states *'the council will protect cultural and leisure facilities valued by the community'*. The Gym aims to reach a different market than conventional operators. This is seen in the type of offer it provides, mainly through weights and cardio vascular machines, rather than organised group fitness, and through the membership and cost structure, providing a lower cost option. As such they have found that it provides a valuable resource and source of exercise/fitness for a range of local people, including those who do not work 'regular' 9-5 jobs, which is becoming increasingly common, especially in this central urban location.

6.4 The nature of the economy is changing, whereby the previous rigid patterns of employment are more fluid and flexible, and The Gym have therefore witnessed demand for flexibility in their operation to cater for a wider demographic across all of their existing operations. As such whilst the majority of members utilise The Gym during the day, increased access has become a key element of The Gym's operation and this flexibility in opening hours is particularly important for those who work on a shift basis, including doctors, nurses, ambulance, police, fire and other workers.

6.5 As a result The Gym have developed a detailed and comprehensive strategy in relation to their increased opening hours to ensure that there is no unacceptable impact on surrounding occupiers, either through the operation itself or members arriving at and leaving the site. This has been successfully rolled out across all existing The Gym operations to ensure there is no detrimental impact on the local environment or amenity.

Design and appearance

- 6.6 The proposal, for the variation of conditions to extend the hours of use of the existing basement unit will not result in any external changes to the existing unit. As such, there would be no impact upon the existing visual character of the area. The proposal would be acceptable in this regard.
- 6.7 As detailed in the sections above, advertisement consent for The Gym has already been approved.

Residential amenity

- 6.8 The proposals would not result in any increase in built form or footprint, and in this regard there would be no additional impact upon the amenities of adjoining neighbouring properties in terms of any additional overbearing effects or any loss of light or outlook.
- 6.9 As detailed within the sections above, the current basement unit is restricted to opening hours between 06:00 - 23:00 Monday to Friday, 07:00 – 22:00 Saturday and 08:00 – 22:00 on Sundays and Bank Holidays. This current proposal seeks to extend this to a 24 hour operation in line with the previous planning approval granted in 2015. As such, a major consideration of this application would be the potential for noise impact of these extended hours upon the amenities of adjoining occupiers.
- 6.10 In planning policy terms, DP26 states *'the council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity'*. DP28 states *'the council will seek to ensure that noise and vibration is controlled and managed'* with *'appropriate attenuation measures'*. Policy A1 states *'the council will seek to protect the quality of life of occupiers and neighbours'*. Policy A4 states *'the council will seek to ensure that noise and vibration is controlled and managed'* and *'will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity'*. Policy 7.15 of the London Plan requires *'that proposals avoid significant adverse noise impacts upon health and quality of life, and proposals should also mitigate and minimise the potential adverse impacts of noise'*.
- 6.11 From an assessment of visitors to other similar operations around the country and the scale and nature of the operation proposed, only 9.29% of visits are made between the hours of 23:00 and 06:00, with very minimal attendance between 00:00 and 06:00. Due to the nature of the gym use members attending between these hours tend to do so on an individual basis, rather than as part of groups, and comprises those working shifts, such as emergency service personnel. As such the potential for any impact in terms of noise and disturbance during these hours is limited and the extended hours of operation of the unit would not result in additional harm to the amenities of adjoining neighbouring or surrounding properties.
- 6.12 In terms of the operation of the gym facility itself, audio / visual equipment is placed on anti-vibration mounts, with volume limiters on all equipment to restrict sound to an acceptable level. The volume limiter is kept in a secure area of the gym to ensure that this cannot be interfered with. Audio / visual equipment in the gym is limited to a small number of units which are located around the building to avoid hotspots of noise. These are kept to a minimum noise level, enabling members to utilise personal MP3 players.

- 6.13 This planning application submission is supported by information from Clarke Saunders Acoustics, which provides an assessment on the suitability of the premises for the extended operational hours of the basement unit of The Gym.
- 6.14 The letter confirms the basement use of as a gym is considered to be suitable for 24 hour health and fitness use. It confirms that the detail on design and operational considerations throughout the 24hr opening hours will ensure appropriate operation without impact on the amenities of surrounding occupiers or local environment. The measures include:
- The premises are completely underground, with the only adjacent structures being below ground restricting the opportunity for noise and vibrational impacts on neighbours.
 - The layout of the gym facilities and equipment is intended to assist the control of noise and vibration transmission to the neighbouring hotel and street.
 - Free weights are located at a lower level and are fitted with a suitable floor system to minimise impact.
 - Coached classes only take place during daytime working hours in functional areas.
 - Changing rooms and functional areas are placed at upper levels and will generate lower levels of noise.
 - Existing plant and ventilation equipment is being retained, with no additional plant.
- 6.15 Given the nature of the operation, the management controls and mitigation measures employed by The Gym, the proposed use of the premises on an extended hours basis, would not have a detrimental impact on the amenity of residents within the surrounding area. The Gym are a considerate and conscientious operator who rely on the local population for a considerable element of their membership and as such take their responsibility to the local environment and surrounding occupiers very seriously to ensure that disturbance does not occur at any hour of the day or night.
- 6.16 The Gym has experience of providing 24 hour health and fitness uses in similar locations to the application site, including within residential buildings in Angel and West Hampstead. Due to the proposed nature of the operation, the proposed insulation and control measures to be incorporated, as set out below, it is considered that the proposed use on a 24 hour basis would not have an unacceptable impact on the amenities of surrounding occupiers or the environment within the local area.
- 6.17 Maintaining a friendly and welcoming environment and deterring any anti-social behaviour is a priority to both the Gym Group and to its members. The Gym Group successfully operate on a 24 hour basis utilising this well tested system and have an exemplary safety record across all existing operational Gyms in the UK. This includes the operation of 24 hour premises adjacent to and in close proximity to residential properties, as well as 24 hour units within many residential buildings. The established operation and management measures set out will ensure a safe environment without an unacceptable impact on local amenity.
- 6.18 Overall the proposed nature of the operation, together with the mitigation and management measures, existing building specification will ensure that there are no unacceptable impacts on

adjoining and surrounding occupiers or the local environment. As such the proposal complies with Policy 7.15 of the London Plan, Policies DP26 and DP28 of the Development Policies Document, and Policies A1 and A4 of the emerging Local Plan.

Premises security

- 6.19 Ensuring that a high level of security is provided throughout the operation is a principle objective of The Gym. Maintaining a friendly and welcoming environment and deterring any anti-social behaviour is a priority of both The Gym and to its members.
- 6.20 Access to the property is strictly controlled. Between the hours of 8am and 8pm the front door of the premises will be open and access will be afforded to the lobby. At this point a two door portal will be in operation which requires a personal entry code to be entered into a key pad and restricts access to one person at a time only. The pin code enables The Gym to record attendance within the premises. These full height glazed partitions and portals also provide a barrier to noise transmitting from the main body of the gym via the accesses.
- 6.21 Free standing computer terminals within the entrance area of the premises enable people to join up to The Gym or to manage any issues relating to existing membership and entry. Call points are located externally to enable any users to address issues directly.
- 6.22 Between 8pm and 8am the main front entrance door is locked and again pin code input is required to gain access to the premises to restrict access to the entire premises to members of The Gym only outside of core hours.
- 6.23 An extensive network of CCTV cameras will operate throughout the premises providing coverage of all internal areas and external entrances. This CCTV will be monitored on a 24 hour a day basis through a remote monitoring system enabling operatives to identify and react to potential issues immediately.

Transport matters

- 6.24 The existing gym unit is located in an area of excellent accessibility for public transport, a PTAL rating of 6b, and there is an NCP car park facility located to the north (rear) of the site. The Gym attracts clientele which are usually based locally, and are likely to go to the gym on foot and by public transport. The majority of trips are undertaken as linked trips either on their way to and from home or work, or as part of utilising other services and facilities within the area. In addition, as classes are not provided as part of the offer this limits the potential for large numbers of people to arrive at The Gym at a set time.
- 6.25 The proposed gym operation is designed as a local use, focused on those within the immediate surrounding community. They are located in urban areas where the membership for the use is drawn from a local catchment. Access to The Gym by foot and public transport is therefore encouraged.
- 6.26 In planning policy terms, DP16 states '*development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links*'.

- 6.27 The proposed use will result in minimal deliveries and servicing as the use generates minimal waste and the deliveries are limited to minimal vending products.
- 6.28 Given the low number of additional visits that are likely to be made to the unit during the extended hours opening hours, it is considered that the extended opening hours would not result in any parking or transport issues. The proposal will not result in external noise impacts above existing levels of noise in this location within the CAZ.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 This planning statement is submitted on behalf of The Gym Ltd in support of the application for the variation of Condition 1 of 2015/4716/P to allow for a permanent 24 hour operation of basement gym unit.
- 7.2 Planning permission for the use of the basement unit for D2 (Leisure) use was granted in 1998 and the proposals seek to extend the operating hours of the unit, from the requirements of the previous operator of the unit, in order to maintain a health and fitness facility in this Central London location. The main considerations for the application would be the noise impacts associated with the extended hours of operation for the basement unit.
- 7.3 The mitigation measures incorporated into the building and the building fit out specification ensure that there are no unacceptable impacts in terms of noise on adjoining and surrounding occupiers or the local environment. Providing a high level of security throughout the operation is a principle objective of The Gym. Maintaining a friendly and welcoming environment and deterring any anti-social behaviour is a priority to both the Gym Group and to its members.
- 7.4 Clarke Saunders have confirmed that the proposal will not result in any unacceptable impact on the amenity of surrounding occupiers or the local environment, and include details of the measures to be incorporated within the current fit out.
- 7.5 The Gym Group successfully operate premises across the country on a 24 hour basis and utilising this well tested system in all locations. The Gym Group have an exemplary safety record across all existing Gyms in the UK. Therefore the operation and management of the premises will ensure a safe environment without an unacceptable impact on local amenity.
- 7.6 This planning statement has considered that the proposed extended hours of operation of the unit will, as a result of the mitigation measures proposed, not have any unacceptable impact on the amenities of the adjacent residents by way of noise or disturbance.
- 7.7 The proposal is in compliance with the Development Plan and we therefore respectfully request that the Council grant consent for the variation of conditions as proposed.