

18th December 2018



Development Management
London Borough of Camden
Camden Town Hall Extension
Argyle Street
London
WC1H 8EQ

Dear Sir/Madam,

RE: CHANGE OF USE FROM CLASS A1 (RETAIL) TO CLASS D2 (GYMNASIUM) AND MINOR EXTERNAL ALTERATIONS – 5 HARBEN PARADE, FINCHLEY ROAD, LONDON NW3 6JR

Please find enclosed a full planning application for the change of use to Class D2 of an existing ground floor retail unit at 5 Harbden Parade, Finchley Road. The application is submitted on behalf of PureGym Ltd to enable it to operate a 24-hour gym at the site. This letter sets out the background to the planning application and demonstrates the acceptability of the proposal.

The application forms, certificates and plans, together with other supporting documents, have been submitted electronically via the Planning Portal (ref: PP-07490004) and the requisite fee of £462 has been paid at the point of submission.

Background

The application site is located to the south side of Finchley Road within the defined boundaries of the Finchley Road/Swiss Cottage Town Centre. It currently comprises a vacant retail unit that was previously occupied by Argos and is arranged over ground and lower ground floors. The application site forms part of a purpose-built parade of commercial units facing Finchley Road, with three storeys of flats set back at upper levels with Harold House. Service access is provided to the rear via Fairfax Road.

The application site is surrounded by other commercial units on Finchley Road and is immediately adjoined by a Superdrug store and British Heart Foundation charity shop. To the rear of the site there are further blocks of flats forming part of the same development and accessed from Harben Road.

Retail use of the application site has been established for some time and there is only limited planning history relating to the site, none of which is relevant to the current proposal.

Proposed Development

The proposed development will enable the application site to be occupied by PureGym, the UK's largest gym group with over 200 sites throughout the UK. The nearest existing PureGym facilities are in Camden Town and at Marylebone. PureGym was established in 2009 and provides affordable gym membership on a flexible, no contract basis. Every gym provides an excellent range of fitness equipment and machinery, and offers a range of classes and other services such as personal training. Gyms operate on a 24-hour basis, seven days a week, providing access to the whole community, including those who work irregular shift patterns and unsociable hours.

The proposed gym at Finchley Road will comprise a main gym area, studio, free weights and activity zone across approximately 785 sq. m of floorspace. In addition, changing facilities and showers will be provided, as well as staff facilities. It is expected that the proposal will create around 12 full and part-time jobs, including management roles, personal trainers and cleaners. As part of the proposed change of use, some minor external alterations will be made to the front of the unit. These include the installation of new automated bi-parting folding doors in black.

T. 07908 914054 | E. jonathan@urbanagile.co.uk | www.urbanagile.co.uk

Registered Address: Urban Agile Limited, 32 Moorfield Road, Salford M6 7QD | Company Registration No. 11548850

Planning Considerations

Principle of the Proposed Development

The development plan for Camden comprises the Camden Local Plan which was adopted in 2017. The Local Plan identifies eight key challenges being faced by the Borough, one of which is 'Health and Wellbeing', with paragraph 1.28 of the Plan noting that Camden has one of the largest health inequality gaps in England and that addressing these issues goes beyond improving access to medical facilities and includes a range of measures to improve the social and physical environment within the Borough.

The Local Plan is informed by the vision for the Borough set out within the Camden Plan. The Camden Plan has three key objectives, the first of which is to develop new solutions to reduce inequality and improve health and wellbeing. Strategic Objective 11 of the Local Plan seeks to improve the health and wellbeing of Camden's population and reduce health inequalities through good spatial planning, supporting healthier lifestyles and environmental improvements.

Policy C1 of the Local Plan addresses health and wellbeing and states that the Council will promote strong, vibrant and healthy communities, including through the provision of local services to support health, social and cultural wellbeing, and by reducing inequalities. Policy C3 of the Local Plan addresses cultural and leisure facilities and states that the siting of new facilities should take into account associated impacts, and that large-scale facilities should be located where as many people as possible can enjoy their benefits and can make use of public transport to get there.

The application proposal will offer significant support to Strategic Objective 11 and Policies C1 and C3 of the Local Plan. It would extend access to low cost, flexible and high-quality health and fitness facilities for those who live and work in this part of the Borough and thereby promote healthier lifestyles. PureGym operates on a flexible, low cost basis that does not 'lock-in' members to a contract and therefore provides a membership model that proves particularly attractive to those on low incomes, helping to reduce health inequalities. Its 24-hour opening also means that it can cater for shift workers and those who work unsociable hours. We note that approximately a third of PureGym members have not previously been members of a gym or health club and that the business has therefore played an important role in extending membership of, and access to, private fitness facilities within the UK. The proposed gym will directly contribute to improving the health of local communities, reducing health inequalities and improving access for all to leisure, sports and recreation facilities. As such, the proposed development will support the creation of healthy, inclusive communities in a safe and accessible environment, as encouraged by paragraph 69 of the NPPF.

Strategic Objective 5 of the Local Plan also states that the successful development of the Borough's town and neighbourhood centres will be supported, while adapting to changes in their role and how people shop. The Council will appreciate that gymnasiums are a 'main town centre use' for the purposes of the NPPF and that they are therefore expected to be directed to locations within defined centres. The application scheme therefore accords with the requirements of paragraphs 86 to 88 of the NPPF.

Policy TC2 of the Local Plan addresses 'Camden's centres and other shopping areas' and states that the Council will seek to protect and enhance the role and unique character of each of Camden's centres, provide for a maintain a range of shops, services and other suitable use to provide variety, vibrancy and choice, and pursue the individual planning objectives for each centre set out in supplementary planning documents. The policy goes on to state that the Council has designated primary and secondary frontages in its centres and will seek to protect the primary frontages as locations with a high proportion of shops and the secondary frontages as locations for shops and a broader range of other town centre uses.

Policy TC4 of the Local Plan addresses town centre uses and states that the Council will ensure that the development of shopping, services and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. Policy TC4 sets out a range of measures by which the Council will seek to avoid such harm including the

effect of the development on shopping provision, the health impacts of development, the impact of the development on nearby residential uses and noise and vibration generated either inside or outside the site.

In terms of Policy TC2, it should be noted at the outset that the revised NPPF longer requires local planning authorities to define primary and secondary shopping frontages. This omission is deliberate and reflects the provisions of new paragraph 85 of the NPPF which emphasises that local planning authorities should allow centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries. The removal of the requirement for policies to address retail frontages from Section 7 of the NPPF reflects a general trend in Government thinking to promote adaptable and resilient town centres, and follows various extensions to permitted development rights for main town centre uses. The weight afforded to Policy TC2 should therefore reflect the degree to which it is consistent with the provisions of the NPPF.

Notwithstanding this, it is considered that the proposed development accords with Policy TC2. The proposed development will support the vitality and viability of the Finchley Road/Swiss Cottage Town Centre by introducing a new town centre facility that will bring a vacant unit back in to active use, broaden the appeal of the centre to visitors, support footfall and extend activity within the town centre as a result of its 24 hour operation.

The application site forms part of the primary frontage to the south of Finchley Road which extends between the Waitrose store at Canfield Gardens and the junction of Finchley Road and College Crescent. Appendix 4 of the Local Plan indicates that the Council expects a minimum of 75 per cent of units within this frontage to be in Class A1 use. In total, the frontage currently comprises 39 commercial units, of which seven (18%) are currently in non-retail use. The proposed change of use of the application site from Class A1 to Class D2 will increase this to eight units in non-retail uses, or 20.5% of all units within the primary frontage. Very similar proportions apply within the portion of frontage up to Fairfax Road. Full details of this analysis are contained within the attached note. Given that 79.5% of units within the primary frontage will remain in Class A1 use, the minimum threshold set within the Local Plan will be maintained and the current proposal would accord with the requirements of Policy TC2.

In terms of Policy TC4 of the Local Plan, for the reasons given above, the proposed development would not cause harm to the character, function, vitality and viability of the town centre or shopping provision, but will deliver a range of benefits including positive health impacts. The impacts of the proposed development on amenities is discussed further below. It should be noted that PureGym successfully operates numerous 24-hour gymnasiums in similar town centre locations throughout the UK, including elsewhere within Camden, with no significant impacts on neighbouring amenities. A such, the application proposals accord with the provisions of Policy TC4 of the Local Plan.

We therefore consider that the proposals are acceptable in principle and support a range of objectives set out within the development plan and national planning policy.

Other Issues

The application site is located in a highly accessible location on Finchley Road that is afforded a PTAL rating of 6a by Transport for London. The underground station at Swiss Cottage is located 125 metres to the south of the application site providing access to Jubilee line services. Other underground services, including Metropolitan line services, can be accessed at the Finchley Road station that is located 200 metres to the north of the application site. There are bus stops immediately adjacent to the site on Finchley Road providing access to very regular services to North Finchley, Edgware and Brent Cross. There are also night bus services providing round-the-clock access to public transport facilities. A high proportion of visitors to the proposed gym would be expected to travel on foot, either as part of linked trips with other sustainable modes of transport or from surrounding residential areas, to which the application site is well connected.

The application submission is supported by two noise impact assessments that have been prepared by Pace Consult. These reports have considered potential noise intrusion to immediately adjacent residential properties at Harold House and potential noise break-out from the gym. The reports include a number of recommended measures to ensure that impacts from noise and vibration are acceptable. It should be noted that the free weights area is to be located on the lower ground floor of the application site, with the general gym area and studio space located on the ground floor. Studio classes would not take place during the overnight period during which the number of visitors to the gym would be substantially lower than at other times of the day. Notwithstanding that this is busy central location and that Finchley Road is trafficked day and night, it is noted that gym members will normally arrive individually and are almost certain to do so during night hours. There are consequently no issues with groups of people, loud conversation or any sort of anti-social behaviour. The proposed development would therefore accord with the relevant requirements of Policy TC4 of the Local Plan.

In terms of safety, we note that the 24-hour use will ensure continuous surveillance of the premises, including external spaces. All PureGym facilities are highly secure with entry controlled via pods that can only be operated using a unique 8-digit PIN number that is issued to each member. Changing rooms are also protected with access control PIN operated key pads. Additional protection is provided by an extensive CCTV system with cameras typically covering entrances, staircases, the gym floor and all fire doors.

Finally, the application scheme proposes minor external alterations to the front elevation of the application site. These works will involve the replacement of the existing two entrances with a single entrance comprising a bi-folding automatic door that will assist access for the mobility impaired. New signage would be subject to a separate application for advertisement consent.

Conclusions

The proposed change of use to provide for a 24-hour gymnasium at 5 Harben Parade will support the objectives of both local and national planning policy. It will help to significantly improve the provision of health and fitness facilities within this part of Camden and the accessibility of such facilities. This will therefore serve to promote healthier lifestyles. The application scheme will also support the vitality of the town centre at Finchley Road/Swiss Cottage and help to diversify the mix of uses within this part of the town centre. We therefore commend this planning application to the Council and request that it be approved without delay.

We look forward to hearing from you in due course. If, in the meantime, any further information is required then please don't hesitate to contact me.

Yours sincerely,



JONATHAN WADCOCK
Director

