



planning
transport
design
environment
infrastructure
land

Planning Statement
190 Finchley Road

January 2022 RD/16513

Contents

1	INTRODUCTION	2
1.1	Purpose of this Statement	2
1.2	Background	2
1.3	Statement Structure	2
1.4	Supporting Documentation	2
2	SITE AND SURROUNDING CONTEXT	3
2.2	Planning History	5
3	PROPOSAL	6
3.1	Description of Development	6
3.2	Accessibility	6
3.3	Operation / Hours of opening	6
3.4	Refuse and Recycling	6
3.5	Parking and Deliveries	6
4	PLANNING POLICY BACKGROUND	8
4.1	Introduction	8
4.2	The London Plan (2021)	8
4.3	Camden Local Plan (2017)	9
4.4	Redington and Frognal Neighbourhood Plan (Submission Version, May 2020)	11
4.1	National Planning Policy Framework (NPPF) (2021)	11
5	PLANNING CONSIDERATIONS	13
5.2	Principle of Development	13
5.3	Impact on the character of the local area	15
5.4	Impact on neighbouring amenity	15
5.5	Access	16
5.6	Highways	16
6	CONCLUSION	18
6.1	Summary	18
6.2	Conclusion	18

1 Introduction

1.1 Purpose of this Statement

1.1.1 This report has been prepared by DHA Planning in support of a planning application for full planning permission, submitted on behalf of our clients, KTV Limited.

1.1.2 The application seeks permission for the change of use of the unit at 190 Finchley Road from a coin operated laundrette (Sui Generis) to a café / retail store (Class E).

1.2 Background

1.2.1 The application site comprises a mid-terrace mixed use building that is located on the northern side of Finchley Road, Camden. The unit is arranged over the ground floor and basement in the building. It is understood that the unit was in occupation as a coin-operated laundrette (Sui Generis) from 1969. The unit has been vacant since July 2019. The proposal seeks to change the use of the unit from the laundrette to a café / food retail store under Class E.

1.3 Statement Structure

1.3.1 Section 2 of this Statement sets out the context of the site, the immediate surroundings and the relevant planning history.

1.3.2 Section 3 has regard to the proposed development.

1.3.3 Section 4 reviews the planning policy context through which the planning application will be determined, having regard to the advice of the revised National Planning Policy Framework (NPPF) and the formal policies of the development plan.

1.3.4 Section 5 considers the 'principle' of the development and other relevant planning considerations.

1.3.5 Section 6 draws conclusions to justify why we consider the development to be acceptable.

1.4 Supporting Documentation

1.4.1 The application is supported by the following information:

- Covering Letter (DHA Planning)
- Site Location Plan
- Block Plan
- Existing Floor Plan
- Proposed Floor Plan

2 Site and Surrounding Context

2.1.1 The application site is located within the designated Secondary Shopping Frontage in the Finchley Road / Swiss Cottage Town Centre, as shown in the Policies Map below (Figure 1). The town centre supports a wide variety of shops and services. The site is also within the Frognal Road Neighbourhood Plan Area.

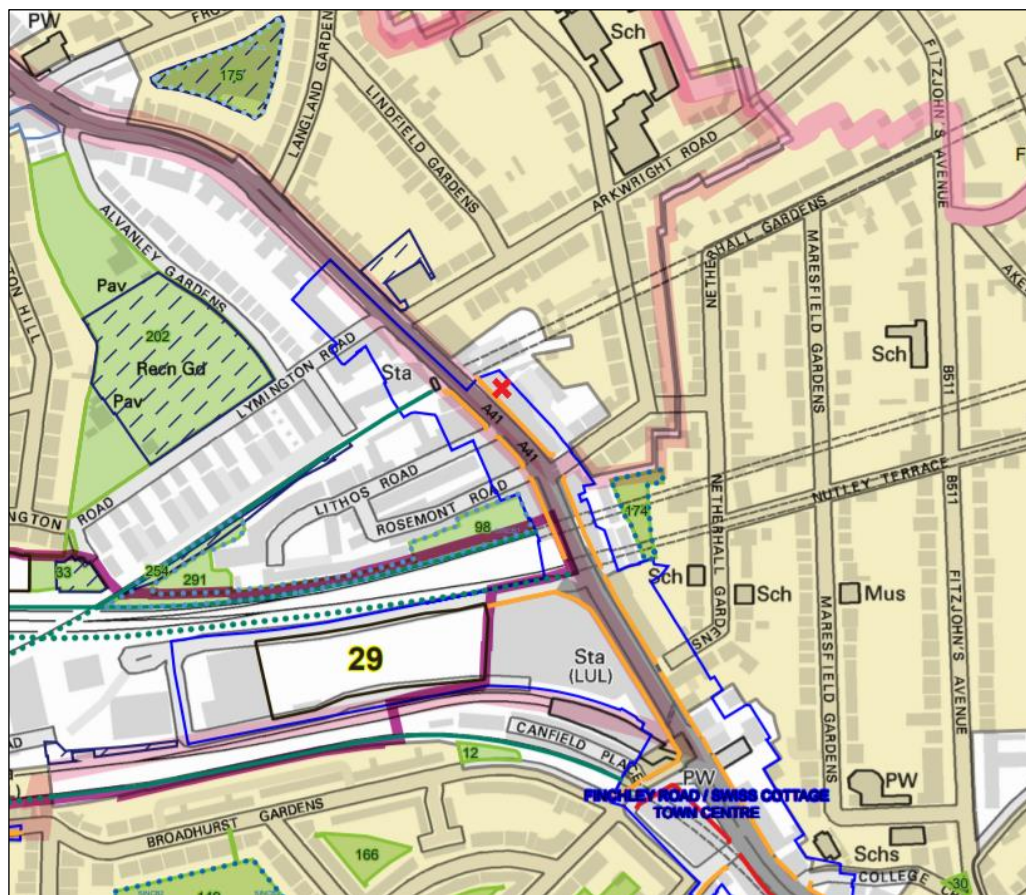


Figure 1: Camden Policies Map (site denoted by the red 'x')

2.1.2 The application site comprises the ground floor and part of the basement of the property at 190 Finchley Road. The unit has a cumulative gross internal area of approximately 81m². The entrance to the unit is located on the front elevation the unit at ground floor level. The last regularised use of the unit is as a coin operated laundrette under Sui Generis that was in operation since 1969. It is understood that the unit has been vacant since July 2019. The upper floors of the building are in residential use under Class C3.

2.1.3 The site forms one of a row of 3.5 storey buildings located on the northern side of Finchley Road. The buildings retain original Victorian red brick frontages with timber framed windows on all levels. The ground floor of each building comprises a range of uses, mostly including retail, commercial, food takeaways and offices. The first floors appear to comprise either residential dwellings or ancillary storage / office uses for the ground floor uses. The upper levels, including the third floor and roof spaces, appear to all be in residential occupancy.



Figure 2: Site Photo – 190 Finchley Road

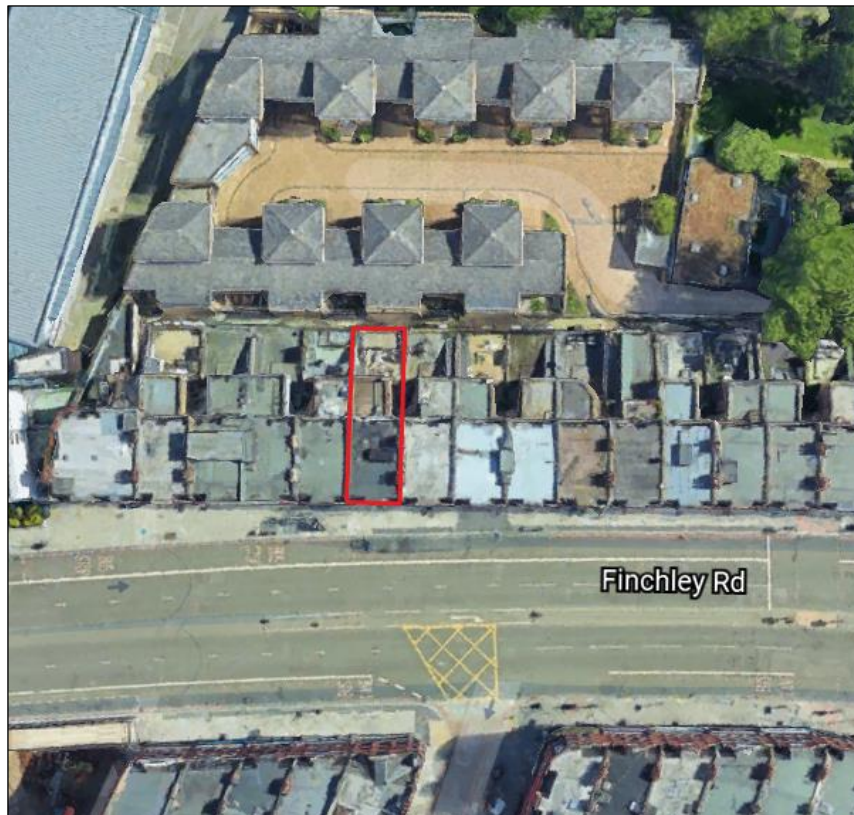


Figure 3: Satellite image of site (site highlighted in red)

2.1.4 Finchley Road (A41) forms part of the Transport for London Road Network. The stretch of road forms the western boundary of the Redington Froggnal Conservation Area. In general, the streets leading off of Froggnal Road are characterised by Edwardian and Victorian rows of terraced buildings and mansion blocks that are of a high architectural merit.

2.1.5 In relation to accessibility, the site is within an area with a Public Transport Accessibility Level (PTAL) rating of 6a (where 0 is the worst and 6b is the best). The site is located almost opposite the Finchley Road & Froggnal underground station which serves the London Overground service. Finchley Road Station is located approximately 0.2 miles (a 5 minute walking distance) to the south of the site. There is a bus stop (Stop FF) that is situated directly to the front of the unit.

2.2 Planning History

2.2.1 The relevant planning history for the site is provided below:

Application reference	Description	Status
2005/4256/P	Existing use as 2 self contained studio flats on the first floor and 2 self contained one bedroom flats on the second and third floors.	Approved 7th February 2006
F6/7/7/7362	Installation of new shop front and erection of external flue pipe at rear in connection with the use of the premises as a coin-operated laundry, at 190 Finchley Road, Camden.	Approved 3rd June 1969
CA486/A	At 190 Finchley Road, Camden. One 10'0" x 2'0" illuminated fascia panel, lettering of varying sizes in blue and opal, "Westinghouse coin operated laundry and dry cleaning laundromat equipped"; overall height 14'0".	Approved 9th June 1969
6978	Erection of exhaust ducts at rear of 190 Finchley Road, Camden.	Approved 14th April 1968
5205	Change of use from shop to car showroom of ground floor and formation of vehicular access to building at 190 Finchley Road, Camden.	Approved 19th April 1968
CA120	Advertisement boards on forecourt of 190 Finchley Road.	Refused 9th September 1952.

3 Proposal

3.1 Description of Development

- 3.1.1 The proposal is for the change of use of the ground floor of the unit from a coin-operated laundrette (Sui Generis) to a food retail unit / café (Class E (b)).
- 3.1.2 No external changes are proposed to the building. The proposal will involve alterations to the internal layout of the ground floor to allow for the operation of the proposed use.
- 3.1.3 The proposed use is as a café / food retail store under Class E. The unit will sell cold food (such as salads) and drinks. No primary food preparation will be undertaken on site, and no alcohol will be served at the premises. The food will be prepared in a separate location, in a central processing kitchen that serves a number of branches. The prepared food will be delivered to the site on a daily basis, whereby it will be assembled and sold by way of a salad bar / kiosk area.
- 3.1.4 Food and drink will primarily be sold on the site for consumption on the premises.
- 3.1.5 The internal arrangement will include customer seating to the front toward the entrance, alongside the salad bar / kiosk and WC to the rear.

3.2 Accessibility

- 3.2.1 Access to the premises is by way of the front door that is located to the middle of the front elevation of the building.

3.3 Operation / Hours of opening

- 3.3.1 The unit will operate as a café / food retail service. It is proposed that the unit is open between 11am – 11pm, 7 days a week.

3.4 Refuse and Recycling

- 3.4.1 Refuse and waste will be disposed of to the front of the premises. A private company (First Mile) will collect and appropriately dispose of the waste and recycling on a daily basis.

3.5 Parking and Deliveries

- 3.5.1 No parking spaces are proposed to be associated with the unit. Both staff and customers are expected to arrive by public transport, on foot or by bicycle. There is a bus stop (Stop FF) that is located directly to the front of No. 188 Finchley Road. Finchley Road overground station is also located opposite the site on the southern side of Finchley Road. Finchley Road Tube Station is also located approximately 0.2 miles to the south, approximately 5 minutes by foot.
- 3.5.2 Deliveries will be made on a daily basis by way of a small panel van for the purposes of providing food and drink for distribution. Deliveries will generally be made in the morning before the store opens via a loading bay that is located directly outside of the unit. The loading bay permits stopping between 10am and

4pm. Deliveries will be made within these hours to negate any impact on the local highway network.

4 Planning Policy Background

4.1 Introduction

- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. This section sets out relevant policies of the statutory development plan and refers to any other material planning considerations that should be taken into account in determining this application.
- 4.1.2 The statutory development plan in this instance comprises the London Plan (2021), Camden Local Plan (adopted July 2017), Redington and Frognaal Neighbourhood Plan, and the adopted Policies Map.
- 4.1.3 Other material planning considerations include the National Planning Policy Framework ('NPPF') (revised July 2021), the National Planning Policy Guidance ('NPPG') and supplementary planning guidance and standards.

4.2 The London Plan (2021)

- 4.2.1 The London Plan is the overall strategic plan for London that sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.
- 4.2.2 **Policy SD6 (Town centres and high streets)** suggests that the vitality and viability of London's town centres should be promoted and enhanced by (amongst other things) encouraging a diverse range of uses; strengthening the role of town centres as a main focus for Londoners' sense of place and local identity; supporting adaptation and diversification of town centres; management and promotion of vibrant daytime, evening and night time activities to enhance vitality and viability of town centres; and support and enhancement of the varied role of London's high streets.
- 4.2.3 **Policy E9 (Retail, markets and hot food takeaways)** states that development plans and proposals should support convenience retail in all town centres. In addition, care should be taken to manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives of the London Plan including town centre viability and vitality, sustainability, place making, community and mental and physical well-being. Development proposals containing hot food takeaway uses (formerly Class A5, now Sui Generis) should not be permitted within 400 metres of schools. Care has to be taken to manage over concentration of such uses in town centres.
- 4.2.4 **Policy D13 (Agent of Change)** places responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Conversely, new noise and other nuisance generating development proposed close to noise sensitive uses (such as residential) should have measures in place to mitigate and manage noise impacts to neighbouring residents.
- 4.2.5 **Policy T4 (Assessing and mitigating transport impacts)** identifies that the cumulative impacts of development on public transport and the road network

capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated. In general, new development should support the use of sustainable modes of transport, including walking, cycling and public transport networks.

4.3 Camden Local Plan (2017)

4.3.1 The Camden Local Plan ('CLP'), adopted in July 2017, is a key document that provides a framework for planning in the Borough. The Local Plan covers the period 2016 – 2031.

4.3.2 **Policy G1 (Delivery and location of growth)** states that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings. The most significant growth in the borough is expected to be through a concentration of development in specific growth areas (such as King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road), and also at other highly accessible locations, in particular town centres such as Finchley Road / Swiss Cottage.

4.3.3 **Policy A1 (Managing the impact of development)** seeks to protect the quality of life of occupiers and neighbours. The policy states that permission will only be granted where it is clear that development will have no unacceptable harm on neighbouring amenity. This includes, for example, increased noise, visual privacy / outlook, lighting, transport and odours.

4.3.4 **Policy E1 (Economic development)** identifies that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing benefits for local residents and businesses. To do so, amongst many aims, the Council will support businesses of all sizes (in particular small and medium-sized enterprises) whilst also recognising the importance of other employment generating uses, such as retail.

4.3.5 **Policy C6 (Access for all)** seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.

4.3.6 **Policy TC1 (Quantity and location of retail development)** states that the Council will focus new shopping and related uses in Camden's designated growth areas and existing centres, having regard to the level of capacity available in these locations. The Council will promote significant additional provision in Camden Town Centre, and additional provision in other town centres (including Finchley Road / Swiss Cottage Town Centre).

4.3.7 **Policy TC2 (Camden's centres and other shopping areas)** supports the promotion of successful and vibrant centres through the borough to serve the needs of residents, workers and visitors. To do so, the Council will:

- a. Seek to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located;
- b. provide for and maintain, a range of shops including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice;

- c. make sure that food, drink, entertainment and other town centre uses do not have a harmful impact on residents and the local area and focusing such uses in King's Cross and Euston Growth areas, Central London Frontages, and Town Centres (Refer to Policy TC4 Town centre uses);
- d. support and protect Camden's Neighbourhood Centres, markets and areas of specialist shopping, local shops; and
- e. pursue the individual planning objectives for each centre, as set out in supplementary planning document Camden Planning Guidance on town centres and retail, and through the delivery of environmental, design, transport and public safety measures

In addition, the Council has designated primary and secondary frontages in its centres that are shown on the Local Plan Policies Map. The Council will:

- f. protect the primary frontages as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre; and
- g. protect the secondary frontages as locations for shops (A1) together with a broader range of other town centre uses to create centres with a range of shops, services, and food, drink and entertainment uses which support the viability and vitality of the centre.

4.3.8 **Policy TC4 (Town centre uses)** shows that the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, to the local area or amenity of neighbours. To do so, the Council will consider:

- a. the effect of development on shopping provision and the character of the centre in which it is located;
- b. the cumulative impact of food, drink and entertainment uses, taking into account the number and distribution of existing uses and non-implemented planning permissions and any record of harm caused by such uses;
- c. the Council's expectations for the mix and balance of uses within frontages for each centre are set out in Appendix 4;
- d. the individual planning objectives for each centre, as set out in the supplementary planning document Camden Planning Guidance on town centres and retail;
- e. impacts on small and independent shops and impacts on markets; f. the health impacts of development;
- f. the impact of the development on nearby residential uses and amenity and any prejudice to future residential development;
- g. parking, stopping and servicing and the effect of the development on ease of movement on the footpath;
- h. noise and vibration generated either inside or outside of the site;

- i. fumes likely to be generated and the potential for effective and unobtrusive ventilation; and
- j. the potential for crime and antisocial behaviour, including littering.

To manage potential harm to amenity or to the local area, the Council will, in appropriate cases, use planning conditions and obligations to address issues including: hours of operation; noise and vibration; the storage and disposal of refuse and litter; tables and chairs; expansion of customer areas to ancillary areas; community safety; use of local management agreements to ensure that premises are well managed; and restrict the ability to change the use of a premises.

4.3.9 **Policy TC5 (Small and independent shops)** identifies that the Council will promote the provision of small shop premises suitable for small and independent businesses.

4.3.10 **Policy T1 (Prioritising walking, cycling and public transport)** states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

4.3.11 **Policy T2 (Parking and car-free development)** demonstrates that the Council will limit the availability of parking and require all new developments to be car-free.

4.4 Redington and Frogna! Neighbourhood Plan (Submission Version, May 2020)

4.4.1 The Redington and Frogna! Neighbourhood Plan has been created to guide future development in Redington and Frogna!. The Neighbourhood Plan is statutory planning policy, together with Camden's Local Plan. Its policies seek to ensure that development is sustainable, and preserves or enhances the character or appearance of the conservation area, which is virtually synonymous with the Redington Frogna! Neighbourhood Area.

4.4.2 Policy FR relates to the traditional shopfronts on Finchley Road. The section of the Plan identifies that Finchley Road forms the western boundary of the Redington Frogna! Conservation Area and is lined by Edwardian mansion blocks and other architecture of high merit. The policy seeks to protect the Victorian and Edwardian character of the street, paying particular regard to the shop windows, doorways, stallrisers, fascias, corbels and pilasters. Shopfronts must use a palette of materials similar to the original Victorian frontages. The reinstatement of shop fronts will be welcomed.

4.1 National Planning Policy Framework (NPPF) (2021)

4.1.1 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. The Framework was revised in July 2021.

4.1.2 The NPPF sets out in Paragraph 11 that "*plans and decisions should apply a presumption in favour of sustainable development*" whereby development proposals that accord with an up-to-date development plan should be approved without delay. It notes that where there are no relevant development plan policies, or the policies which are most important for determining the application

are out-of-date, permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

4.1.3 Paragraph 8 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.1.4 As set out in Paragraph 9, decisions should play an active role in guiding development toward sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

5 Planning Considerations

- 5.1.1 This section will consider whether the application proposal accords with the statutory development plan and, if not, whether any material planning considerations indicate that planning permission should nevertheless be granted.
- 5.1.2 In considering whether the proposal accords with the development plan, it is necessary to consider the following issues:
- a) Principle of development
 - b) Impact on the character of the local area
 - c) Impact on neighbouring amenity
 - d) Access
 - e) Refuse and Waste
 - f) Highways

5.2 Principle of Development

- 5.2.1 The application is for the change of use of the existing laundrette (Sui Generis) to a café / retail store under Class E. No external alterations are proposed.

Loss of existing use

- 5.2.2 Paragraphs 9.44 and 9.45 of the Camden Local Plan identify that laundrettes are commonly found in town centres, albeit they sit outside of the retail / office / commercial use classes (i.e. formerly A1, A2, A3, A4, A5, B1a or D1, now Class E) which are generally predominant in these locations. Whilst town centres are considered to be the most appropriate location for laundrettes, in order to serve local residents, the Local Plan also recognises that particular issues can arise from such laundrettes in relation to neighbouring amenity and the local highway network, including emissions, noise and traffic.
- 5.2.3 The existing unit has been in use as a coin-operated laundrette since 1969. The unit became vacant in July 2019 and has not been in operation since this date. It is understood that the current tenant holds a lease that expires in 2027.
- 5.2.4 Whilst laundrettes serve the local community, they do not serve a particular community function in line with the relevant policies of the London Plan and Local Plan. In view of the long-term vacancy of the unit alongside the potential negative impacts of the existing use on neighbouring amenity in particular, it is considered that the loss of the existing use is acceptable in principle.
- 5.2.5 In addition to the above, mitigating the loss of the existing use, there are a wealth of dry cleaners and laundrettes within close proximity of the site that are still in active use and are still able to serve the local community. For example, Abbey Laundry and Dry Cleaners is located at No. 148 Finchley Road. Camure Laundrette is located at 52A Belsize Lane, approximately 0.3 miles to the east, and West Laundrette and Dry Cleaner is located at 198 Broadhurst Gardens approximately

0.2 miles to the west. In view of the number of similar services in the local area, it is not considered that the loss of the existing use of this unit would have any detrimental impact in this regard. As such, the loss of the use would be acceptable.

Creation of café / retail store (Class E)

- 5.2.6 Policy G1 of the Camden Local Plan states that the Council will focus growth within specific growth areas and highly accessible locations including Finchley Road / Swiss Cottage town centre. Policy E1 additionally seeks to support small and local businesses that serve the local community.
- 5.2.7 Policies TC1, TC2, TC4 and TC5 of the Local Plan further seek to distribute new retail uses predominantly to the Council's town centres. The policy additionally identifies that secondary shopping frontages have been designated to protect the provision and retention of a high proportion of shops, whilst also allowing a range of shops, services, food and drink uses which support the vitality and viability of the town centre. Fundamentally, the Council will seek the provision of development that will have limited impact on the character of the centre where the development is located. The Council will also seek a mix and balance of uses that is appropriate for each centre, whilst protecting the character of the local area alongside neighbouring amenity.
- 5.2.8 The proposed use is a café / retail store under Class E (b). The proposed use will serve food and drink for consumption mostly on the premises. Deliveries (for example, Deliveroo) will take place from the site, however this function will be ancillary to the main operation of the unit. The proposed opening hours would be from 11am to 11pm, 7 days a week.
- 5.2.9 The proposal involves internal alterations to allow for a kiosk / salad bar area, W/C and café seating area. Food preparation will mostly take place in a centralised location off-site, and the food will be delivered to the unit on a daily basis. Additional preparation, including the assembly of customised salad bowls and meals, will take place; however, no primary cooking will take place at the unit. The food and drink (including hot and cold drinks but excluding alcohol) will be served within the unit. No external alterations are proposed.
- 5.2.10 The site is located within the designated Secondary Shopping Frontage in the Finchley Road / Swiss Cottage town centre. The town centre supports a wide variety of shops and services, including retail, office and commercial uses. There are a number of similar food and drink and retail premises along the high street that operate within similar hours. The delicatessen at 188 Finchley Road (Berezka London) for example opens from 11am – 8pm daily. 279E Finchley Road (Pizzeria Cozaio, (restaurant under Use Class E)) opens from 12pm – 12am, 305 Finchley Road (Costcutter (retail under Use Class E)) and 289 Finchley Road (Tandis, (restaurant under Use Class E)) opens from 12pm – 11pm. There are a wealth of other late night functions, including takeaways and restaurants that are present along Finchley Road.
- 5.2.11 In view of the location of the site, being within the town centre and also located fronting onto Finchley Road (which forms part of the Transport for London Road Network) it is considered that the new retail / café use under Class E(b) would be a suitable use in this location that would enhance the vitality and viability of the high street.

- 5.2.12 It is worth noting that within the direct vicinity of the site, similar uses under Class E(b), aside from those noted above, are relatively uncommon. The uses directly adjoining the site mainly include offices, small general shops and furniture stores, and a high number of spas / nail bars and beauty stores under Sui Generis. Where there are food retail premises, these generally include restaurants that serve hot food and drink, and do not operate as a café function. Therefore, the addition of a café / retail store in this location would not result in an over concentration of the same use that would be to the detriment of the of the high street. It is instead considered that the proposed unit would meet an unmet need within the vicinity of the site that would both serve the local community and visitors from further afield, helping increase the footfall along the high street in this location.
- 5.2.13 Overall, it is considered that the proposed change of use of the site would comply with the relevant policies of both the Development Plan. As such, the development would be acceptable in principle.

5.3 Impact on the character of the local area

- 5.3.1 Policy TC4 of the Local Plan seeks to ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre.
- 5.3.2 Given the location of the site, the policies contained within the Redington and Frognaal Neighbourhood Plan also apply. Policy FR relates specifically to the traditional shopfronts on Finchley Road, including where the site is located. The policy seeks to protect the Victorian and Edwardian character of the street, through which retention of the original shop frontages is promoted.
- 5.3.3 Whilst internal alterations will be required to allow the use to operate effectively, no external alterations are proposed. As such, the proposal will have no detrimental impact on the character of the local area, or more specifically, to the existing row of units along this section of Finchley Road.
- 5.3.4 In line with the assessment made in Section 5.2 above, it is also not considered that the change of use would have any detrimental impact on function of Finchley Road / Swiss Cottage town centre. It is considered that the proposed use, in serving a retail function, will enhance the existing offer of facilities and services along the high street which will only benefit the viability and vitality of the town centre.

5.4 Impact on neighbouring amenity

- 5.4.1 Policy D13 of the London Plan seeks to mitigate existing and new occupiers from noise nuisance arising from new development or uses. Policy A1 of the Local Plan states that permission would not be granted where development would result in unacceptable impacts to neighbouring amenity. This includes factors such as outlook, privacy, sunlight and daylight, lighting and noise and odours. Policies TC2 and TC4 relate specifically to uses on the high street. The policies further seek to protect amenities of neighbouring occupiers from new and existing uses on the high street.
- 5.4.2 The proposal relates to the lower levels of the unit at No. 190 Finchley Road. The upper levels of the building, similarly to the other buildings within this row of

terraces, includes residential dwellings. The ground floor units are mixed in use and range from retail to sui generis as nail bars / beauty salons.

- 5.4.3 The proposal involves no external alterations to the building and as such would have no impact on neighbouring amenity in terms of loss of daylight and sunlight or increased overlooking / loss of privacy. Moreover, the use would only involve alterations to internal layout to allow for the café / retail occupation of the unit. No outside seating is proposed that would create additional noise or nuisance to the surrounding occupiers. The proposed use would not involve primary cooking on the site and would therefore not result in any detrimental impact in terms of odours or fumes.
- 5.4.4 The proposed opening hours are from 11am to 11pm, Monday to Sunday. This is in line with other similar uses along this part of Finchley Road. In relation to noise, the use as a café / retail unit would not increase noise to a level that would be detrimental to the occupiers of either the residential or commercial units surrounding the site. There would be no increase in traffic as a result of the change of use, nor would there be a heightened level of footfall to the degree that would be noticeable along this stretch of road.
- 5.4.5 Overall, the proposal would comply with the policies of the Development Plan (in particular, Policies E9 and D13 of the London Plan, and A1, TC2 and TC4 of the Local Plan) and would have no increased detrimental impact on the amenities of the surrounding occupiers.

5.5 Access

- 5.5.1 Policy C6 of the Local Plan seeks for new developments to be accessible to all, to remove barriers to access to services and facilities for potential visitors and occupiers.
- 5.5.2 The proposal makes no amendments to the access into the unit, which is to the front of the building at ground floor level. There is no level change from the street into the unit and the internal arrangement will allow for access for all users in line with Policy C6.

5.6 Highways

- 5.6.1 Policy T4 of the London Plan alongside Policies T1 and T2 of the Local Plan seek to mitigate potential detrimental impact of new development on the local highway network. The policies also promote the use of sustainable transport modes and seek to restrict the provision of parking for private vehicles.
- 5.6.2 No parking has been proposed. The site is located in an area with a Public Transport Accessibility Level (PTAL) of 6a (where 0 is the worst and 6b is the best). There is a bus stop located directly outside of the site (Stop FF). Finchley Road & Frognal overground is located opposite to the site on the other side of Finchley Road, and Finchley Road Tube Station is located 0.2 miles to the south (approximately 5 minutes by foot). There are cycle racks intermittently located along the street.
- 5.6.3 In view of the above, it is clear that the site is located in a highly accessible location and therefore would not require any level of parking to serve the site.

Instead, the proposal will seek visitors and staff to maximise the use of sustainable modes of transport in line with Policies T1 and T2 of the Local Plan.

- 5.6.4 In addition, deliveries will take place once daily to provide food and drink to the unit. Deliveries will take place from the loading bay to the front of the site that is available from 10am to 4pm each day. The timing of deliveries will be organised to fit within this timeframe. As such, the proposal will cause no negative impact on the surrounding highway network, and the proposal will be in compliance with the aforementioned policies.
- 5.6.5 Refuse / recycling collection will also take place to the front of the site, which is in line with the refuse arrangements for the surrounding uses. In order to prevent any impact to the surrounding highway it is proposed that refuse and recycling be removed by a private organisation, First Mile. All waste will be collected on a daily basis, removed from the site, and disposed of in an appropriate manner.
- 5.6.6 Overall, the proposal will have no detrimental impact on the local highway network and would therefore comply with the aforementioned Development Plan policies.

6 Conclusion

6.1 Summary

- 6.1.1 This planning statement has been made on behalf of KTV Limited to accompany the application for the change of use of the ground floor unit from a laundrette (Sui Generis) to a retail store / café (Class E) at 190 Finchley Road, Camden.
- 6.1.2 In terms of the principle of the development, the loss of the existing use as a coin-operated laundrette would have no detrimental impact on the high street or to the surrounding area. The unit has been vacant for a substantial period of time, and the existing use has little contribution to the Secondary Shopping Frontage along Finchley Road.
- 6.1.3 The proposed use as a retail / café unit under Class E would be appropriate in view of its location within Secondary Shopping Frontage in Finchley Road / Swiss Cottage town centre. The proposal would not result in the loss of retail on the high street and would be commensurate to the other units along Finchley Road, both in terms of use, operation and opening hours.
- 6.1.4 No external alterations are proposed, and the use would have no impact on the character of the local area nor toward neighbouring amenity, or the local highway network.

6.2 Conclusion

- 6.2.1 Given the above, it is respectfully requested that the application is approved, subject to appropriate conditions.