



APPEAL BY:  
Mr A Kamali

AGAINST THE LONDON BOROUGH OF CAMDEN COUNCIL'S REFUSAL  
TO GRANT PLANNING PERMISSION FOR:

Change of use of the ground floor from a launderette (Sui Generis) to a café/retail  
unit (Class E (b))

AT  
190 Finchley Road, London, NW3 6BX

London Borough of Camden Council's Reference: 2022/0318/P

WRITTEN REPRESENTATIONS: RESPONSE TO LPA STATEMENT AND  
THE THIRD PARTY REPRESENTATION RECEIVED

December 2022

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## **1.0 INTRODUCTION**

- 1.1 This statement has been prepared by RJS Planning, on behalf of Mr A Kamali, in response to the statement of the Local Planning Authority and the third-party representation received.

## **2.0 RESPONSE TO COUNCIL'S STATEMENT**

- 2.1 The following paragraphs will respond where appropriate to the council's statement.

### **Comments of the Grounds of Appeal**

- 2.2 The council's statement confirms that due to a later application ref 2022/3588/P and evidence contained within the appellant's statement that a change of use did NOT result in a lack of launderette facilities in the town centre. Therefore, the council have removed their objections to the appeal proposal in relation to reason for refusal no. 1: change of use (Town Centre impacts).
- 2.3 Regarding reason for refusal no. 2 the appellant has demonstrated his willingness to complete a S106 agreement to prevent future occupiers from obtaining car parking permits.
- 2.4 Upon receipt of a draft legal agreement from the council the appellant will ensure this is completed to enable the Inspector to make a fully informed decision.
- 2.5 In summary, the appeal scheme has overcome the original reasons for refusal and therefore, the development would be compliant with the aims of national, regional and local planning policy.

## **3.0 THIRD PARTY REPRESENTATION**

- 3.1 The appellant acknowledges the third-party representation received and responds where appropriate to material planning considerations.
- 3.2 Redington Froggnal Neighbourhood Forum support the change of use from a coin operated launderette (sui generis) to a café/retail storey (Class E(b)) subject to compliance with the policies of the Redington Froggnal Neighbourhood Plan.
- 3.3 To recap, this appeal relates to a change of use only and does not propose any external alterations to the shopfront.
- 3.4 Whilst the appellant acknowledges that the Forum is keen to restore and reinstate heritage features it would not be appropriate to attach a condition to this effect for this particular appeal.

3.5 Should changes to the shopfront be required these would be subject to a future application.

3.6 Nevertheless, the Forum's support of the change of use should be a material consideration in favour of the proposal.

#### **4.0 SUGGESTED CONDITIONS**

4.1 The appellant will accept any conditions which are reasonable and appropriate to the circumstances of the case.

#### **5.0 CONCLUSION**

5.1 The appellant states that the scheme would not conflict with the aims of national, regional and local planning policy and therefore, respectfully requests that the appeal is allowed.