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Our ref: 2023/3165/PRE
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Dear Jack,

Re: 180 Arlington Road, London, NW1 7HL

I refer to your pre-planning application enquiry 2023/3165/PRE at 180 Arlington Road, London, NW5 4BY. Thank you for sending the documents detailing the proposed change of use and internal works to the property, as well as the site visit conducted on 21/09/2023 and the additional meeting on 10/10/2023.

1. Proposal

Use of the basement, ground, and first floors of the site for interactive entertainment which includes a combination of immersive theatre and drinking establishment (Sui Generis).

2. Site description

The application site is a large Bingo Hall forming part of the Odeon development constructed in 1937, and is primarily situated at ground floor level, with some ancillary space at basement and first floor levels. It is located on the east side of Arlington Road, at the junction with Inverness Street and close to the junction with Parkway. Although part of the Odeon development, the site was split from the Odeon cinema horizontally, with the cinema accessed from Parkway and the application site (which is the lower portion of the site) accessed from Arlington Road.

The site is part of the Camden Town Conservation Area, and although is not specifically noted as a positive contributor, the Conservation Area Statement does reference the dramatic pantiled roof slope as making a distinct contribution to the Conservation Area. The property is not listed.

3. Relevant planning history

Application site

2017/2321/P - External alterations to building including new entrances to both street elevations and addition of plant equipment on northeastern side elevation. **Granted 29/06/2017.**

Other sites

The Post Building, 21-31 New Oxford Street

2022/0757/P - Change of use of part basement, ground and mezzanine levels from flexible retail/restaurant use (previously Class A1/A3) to use as an immersive virtual reality experience (Sui Generis). **Granted subject to a section 106 legal agreement 03/08/2022.**

Stables Market

2020/5876/P – Use of the site for interactive entertainment which includes a combination of immersive theatre and team challenges (sui generis). **Granted subject to a section 106 legal agreement 13/04/2022.**

Horse Hospital, Stables Market

2020/4731/P – Use of the first floor as an immersive theatre space, drinking establishment with ancillary events (sui generis). **Granted subject to a section 106 legal agreement 24/11/2021.**

4. Relevant policies and guidance

National Planning Policy Framework 2023

London Plan 2021

Camden Local Plan 2017

- **G1** Delivery and location of growth
- **C5** Safety and security
- **C6** Access for all
- **A1** Managing the impact of development
- **A4** Noise and vibration
- **D1** Design
- **D2** Heritage
- **E1** Economic development
- **E2** Employment premises and sites
- **E3** Tourism
- **TC2** Camden's centres and other shopping areas
- **TC4** Town centre uses
- **T1** Prioritising walking, cycling, and car-free development
- **T2** Parking and car-free development
- **T4** Sustainable movement of goods and materials
- **DM1** Delivery and monitoring

Camden Planning Guidance

- Access for all (Mar 2019)
- Amenity (Jan 2021)
- Community uses, leisure, and pubs (Jan 2021)
- Employment sites and business premises (Jan 2021)
- Town centres and retail (Jan 2021)
- Transport (Jan 2021)

5. Assessment

The principal planning considerations are considered to be the following:

- Principle of development
- Amenity
- Transport
- Economy and employment

6. Principle of development

Local Plan Policy C3 (Cultural and leisure facilities) makes clear that the Council will seek to “*protect cultural and leisure facilities and manage the impact of adjoining uses where this is likely to impact their continued operation*”. This means that the Council will resist the loss of such facilities except where clearly demonstrated to the Council that there is no longer such a demand and may support opportunities for cultural and leisure facilities to be re-provided on site where appropriate. This will involve, amongst other things, taking into account the impacts of the re-provision on the existing occupier and users of the facility and the changes in the mix of uses arising from the loss of the existing cultural/leisure facility.

The Council’s guidance contained within ‘CPG Community uses, leisure facilities and pubs’ states that Policy C3 is intended to sustain and enhance the rich cultural and leisure offer that Camden offers and that contributes to the borough’s residents’ quality of life, as well as those more broadly from the rest of London and beyond. As such, the Council will normally seek to retain existing cultural and leisure facilities, only allowing the loss where there is extensive justification, including marketing exercise and viability assessment.

The proposal involves the change of use from the existing ‘Mecca Bingo’ hall into an interactive entertainment venue offering immersive theatre and an associated bar and function space. The proposal comes as the bingo hall is due to close, partly as a result of the covid pandemic and partly as a result of general market trends. As such, the site will be vacant for a time, and the proposed use is intended to bring it back into use as a leisure facility.

The proposed use as an immersive theatre would be considered a leisure use that would be supported and sought to be preserved under Policy C3. As such, the change of use would not involve the loss of leisure facilities but would be re-providing an existing leisure use (where the site would otherwise be vacant). Given that the existing occupier is set to leave the property, there is no impact on the existing occupier and their ability to operate. Therefore, the change of use would be acceptable in terms of cultural and leisure facilities, as it would not result in the loss of such a use.

Policy TC2 (Camden’s centres and other shopping areas) aims to promote successful and vibrant centres throughout the borough, including promoting entertainment uses to provide variety and vibrancy. Policy TC4 (Town centre uses) states that the development of 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. As such, development is expected to consider and address relevant issues, such as the distribution of existing uses in the area and the potential impacts on nearby residential amenity.

The application site is located within the ‘Camden Town’ town centre and features a sensitive frontage along Arlington Road (as well as a secondary frontage along Inverness Street). The guidance in ‘CPG Town centres and retail’ sets out that sensitive frontages are those where there is likely to be the greatest conflict between late-night activities and the amenity of local residents. The Council will aim to maintain a balance of uses in these frontages.

The frontage of the site that faces Inverness Street is not proposed to be active, and would be used primarily for servicing and waste management. Audience entry and egress would be through

the Arlington Street entrance. Although this is recognised as a sensitive frontage, there are currently no other commercial uses forming part of this frontage (172-180 Arlington Road), so it is not considered that this use would be contributing to a proliferation of uses that may be harmful to the amenity of nearby residents. Additionally, the existence of Mecca Bingo at this location shows that the unit is suitable to be occupied by a leisure use, although it is expected that footfall is likely to be higher with the proposed use. Further details pertaining to the amenity impacts are detailed below in section 7 of this advice.

The immersive theatre would be an unusual and interesting use that has the potential to attract tourists and visitors to the location and contribute to the function and vitality of the Camden Town area. Entertainment uses that provide a diversity of jobs and keep the town centre vibrant are supported (provided amenity is protected) so the principle of the proposed use would comply with Local Plan Policies TC2 and TC4.

7. Amenity

Local Plan Policy A1 seeks to protect the quality of life of occupiers and neighbours. Factors to be considered include visual privacy, outlook, sunlight, daylight, overshadowing, noise and vibration, and impacts of the construction phase. CPG 'Amenity' provides specific guidance with regards to these factors.

As the proposal is for the change of use of the premises and the nature of the proposal means there would be very little change beyond internal reconfiguration, there are no concerns relating to issues such as privacy, outlook, daylight/sunlight, or overshadowing. The main issues that would be considered by the Council at application stage would relate to the potential disruption caused to nearby residents, particularly with regards to noise and nuisance (including anti-social behaviour).

It is unlikely that there would be additional negative impact on noise due to the plans to re-use the existing entrance and egress points, as well as the relatively small numbers of visitors that would be expected at any one time, preventing a build-up of large crowds. However, in order to ensure that officers are satisfied that there would be no impact on residential amenity, it is suggested that an Operational Management Plan is provided as part of the application, which would then be secured through a section 106 legal agreement were the application to be approved. This would include details that have mostly all been provided as part of various documents but would act as a main document with which to outline and compile all relevant information and details. This would act both as a way to benefit public consultation by providing a clear summarisation of information that is most pertinent to nearby residents, as well as giving the Council security that neighbouring amenity is protected and the change of use would comply with Policy A1.

The information that should be included in the Operational Management Plan is as follows:

- Details of an Operation Management Plan Co-ordinator prior to occupation of the site and a mechanism in place to advise the Council of direct contact details and any changes in the position;
- Details of how the development will be operated and managed with procedures to minimise noise impacts, nuisance, and disruption to nearby residents and neighbours;
- Details of procedures for managing access and egress arrangements including quiet egress at unsociable hours;

- Details of opening hours;
- Details of measures to prevent maximum occupancy exceeding expected maximum figure;
- Details of measures to management customer queuing and dispersal, in and out of the site;
- Evidence of consultation with local community groups;
- Statement summarising representations from local community and local groups including actions that may have been taken in response to representations;
- Details of code of conduct shared with all visitors to the development setting out expected standards both within and in the immediate vicinity of the site;
- Information about the owner's representative (including name and contact details) that are to be made available to the Council and all local residents at all times to ensure any issues or concerns are dealt with in efficient and effective manner;
- Details of a formal complaints procedure to be adopted so that all complaints can be formally logged and dealt with within a set timeframe;
- Details of the mechanism for dissemination of information relating to the on-going management of the development;
- Means of ensuring the provision of a mechanism for the first review of the Operational Management Plan 12 months from the initial occupation date;
- Identification of a means of ensuring a mechanism that allows for the reviewing and updating of the Operational Management Plan as may be reasonably required from time to time for approval by the Council.

A great deal of this information has already been provided as part of the request for pre-application advice, so this will mostly be a case of compiling the existing information into one coherent and clear document. As before, this would then be secured through a section 106 legal agreement and would ensure that the amenity of local residents is protected in line with Policy A1. Being part of a legal agreement would allow it to be a "living document", open to review and adaptation where necessary.

8. Transport

Policy T1 (Prioritising walking, cycling, and public transport) aims to promote sustainable transport by prioritising walking, cycling, and public transport. This is achieved by improving pedestrian friendly public realm, road safety and crossings, contributing to the cycle networks and facilities, and finally improving links with public transport. All these measures are in place to ensure the Council meets their zero carbon targets. Policy T2 (Parking and car-free development) limits the availability of parking in the borough and requires all new developments in the borough to be car-free. This will be done through not issuing parking permits, resisting the development of boundary treatments, and using legal agreements to secure these actions.

In accordance with Policy T1 of the Local Plan, it is expected that cycle parking at the development is provided in accordance with the standards set out in the London Plan. For development of this type, the requirement is 1 space per 8 staff for long stay and 1 space per 30 seats/visitor spaces for short stay. However, as discussed at the site visit and our subsequent meeting on 10/10/2023, it is not practical to provide audience cycle storage on site, due to there being no appropriate location for visitors. The option of cycle storage for staff was discussed, with the service yard or somewhere else internal being suggested as possibilities. These cycle stands should be Sheffield/M-shaped stands or two tier in design. The staff cycling should be indicated in submitted plans, and details would be secured through a condition attached to any approval of the application.

Given the site constraints, it is accepted that it may not be realistic to provide cycle parking for audience members. The possibility of an off-site financial contribution was discussed, but this tends to be sought for residential developments rather than commercial changes of use such as this. Officers will consult the transport strategy team at application stage to understand if contributions to support alternative mitigation measures/projects in the area would be necessary.

In accordance with Policy T2 of the Local Plan, the development should be secured as on-street Business parking permit (car) free by means of a Section 106 legal agreement. This would prevent the development from adding to existing on-street parking pressures, traffic congestion, and air pollution, whilst encouraging the use of more sustainable modes of transport such as walking, cycling, and public transport. Failure of the applicant to enter into such an agreement would constitute grounds for refusal. It should be noted that no off-street parking is currently provided and none is proposed.

Given the minor remodelling of the internal layout to enable the proposed use, it is not necessary to secure a Construction Management Plan and associated contribution and bond for this proposal. In addition to this, a highways contribution would not be necessary for the development. The change of use of the venue is expected to take 75 days to complete, and there is expected to be 4 vehicles per day visiting the site, mostly transit type vans and the occasional larger vehicle. These can be accommodated on the single yellow lines outside the property, where servicing of the site can also take place. In addition to this, bin storage is kept within the service yard at the rear of the building that is accessed from Inverness Street and will continue to be collected outside of market trading hours. Therefore, a Servicing Management Plan is considered unnecessary.

The site has a PTAL score of 6b which indicates that it has an excellent level of accessibility by public transport. The nearest tube station is Camden Town, whilst Camden Road, Chalk Farm Road and Mornington Crescent stations are all within a short walking distance. There are numerous bus services available nearby, including from Camden High Street, Parkway and Bayham Street. The site is thus ideally located for staff and visitors to arrive and depart by public transport. It is anticipated that there would be up to 1,000 visitors per day to the site, with most people arriving in small groups of up to 24 at a time, with up to 31 sessions per day during the week and 47 on a Saturday. It is expected that there would be a maximum of 120 visitors at the site at any one time. When spread across the course of a day, this level of attraction is not considered to have a significant impact on the local public transport network. Therefore, it is considered that a Visitor Travel Plan is unnecessary.

9. Economy and employment

Policies E1 (Economic development) and E2 (Employment premises and sites) of the Local Plan aim to secure a successful and inclusive economy in Camden by supporting employment generating uses, including leisure and tourism. The policies also aim to support schemes that will increase employment opportunities for local residents, including training and apprenticeships.

As part of this pre-application request, evidence of community benefits, an employment and training strategy, and a Schools and Colleges program (including work experience) has been submitted. These are welcomed and the principle of providing employment opportunities is strongly supported by the Council. Similar to the Operational Management Plan previously detailed in section 7, an Employment Training Plan should be submitted with any future application that outlines the employment and training package offered as part of the change of use of the site. In particular, it is encouraged that the applicant thinks creatively about additional benefits in terms of training opportunities and outreach with schools as part of this Employment Training Plan, including the details that have already been provided as part of the 'Community Benefits and Jobs and Consultation' document. It is also mentioned in that document (and was discussed at the site visit) that new job opportunities and roles would be advertised first amongst existing staff at the Mecca Bingo. Retaining existing staff would be supported as a positive development. The

Employment Training Plan would also be secured as part of the agreed section 106 legal agreement, similar to the Operational Management Plan.

It is understood that the applicant's team will be meeting with the Inclusive Economy team at Camden in the near future. Once the development has been discussed and inclusive economy are able to provide more detail feedback on the proposal, this advice can be updated to reflect any further information or advice given which may include support contributions for any apprenticeships or placements.

Those at Camden involved with drafting the Council's 'Evening and Night-time Economy Strategy' have also indicated that this is the kind of scheme that they would potentially view as a positive development, provided it can be shown that it benefits the community. They have also advised that it would be important to show how Arlington Road will be activated in such a way that anti-social behaviour is mitigated against, but residential amenity is protected. It would benefit the application to emphasise how it is considered that the development would reduce anti-social activity, and this would likely be a good area to cover in the Operational Management Plan also.

10. Conclusion

The Council is supportive of the principle of changing the use of the existing bingo hall (Sui Generis) to an interactive entertainment space. This change would maintain an existing leisure use and would have the potential to benefit the vitality, character, and function of the 'Camden Town' town centre. However, care must be taken to ensure that the proposed use would still preserve and protect the amenity of residents, so evidence should be provided to demonstrate the effective operation and management of the site, as well as the community benefits that would be achieved, particularly with regards to employment. As stated above, much of this information has already been provided at pre-application stage, but it should be consolidated into core documents at application stage.

11. Planning application information

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – Full Application form
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement;
- Draft Operational Management Plan;
- Proposed Employment Training Plan;
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a site notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be determined by the Planning Committee. Given the statutory consultation period, the lead-in time for applications that are presented to Committee, and the current outlook for Committee agendas in coming months, it is likely that the earliest date for this application to be presented to Committee would be 11/01/2024. In the event that an application is submitted, the assigned planning officer would provide updates on the likely timescales.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Sam FitzPatrick through the email or number above.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Sam FitzPatrick

Planning Officer
Planning Solutions Team