

# Monmouth Planning Ltd

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Our ref: LP/Camden Street

Development Management Regeneration and Planning  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 9JE

1<sup>st</sup> May 2019

Dear Sirs,

**55B Camden Street, London, NW1 0HG**  
**Change of use of the basement from storage unit (B8) to an escape room (Sui Generis) (130sqm)**  
**Planning Portal Ref: PP- 07798071**

On behalf of our client, IME Investments Ltd, we write in support of the planning application submitted via the planning portal for the change of use of the basement from storage unit (Class B8) to an escape room (Sui Generis).

To assist you with the consideration of this application we enclose with this letter the following documents:

- Application form
- Site location plan
- Existing and Proposed Plan
- Noise Report
- Operational Management Plan
- CIL Form
- Application Fee £462

## **Site description and location**

The application relates to the vacant basement storage unit (130sqm) of a three-storey unit within Marr House, located on the western side of Camden Street. The ground, first and second floors are in residential use.

The majority of the surrounding properties are residential with the exception of the Centro office building to the east. Directly to the west of the site is Camden Town Centre.

The site is not listed, nor does it lie within a conservation area.

The site has excellent public transport links with a PTAL of 6a. Camden Town Tube is approximately 0.4miles (8 min walk) and Mornington Crescent Tube is 0.3miles approximately (7min walk). Camden

VAT REGISTRATION NUMBER: 203 0372 68

Road Train Station is approximately 0.4 miles and Euston Train Station is approximately 0.6 miles away. There are a number of bus routes within easy walking distance. Curnock Estate car park is directly around the corner on Pratt Street with restrictive parking bays outside the site.

### **Relevant Planning History**

#### 55B Camden Street

2016/6442/P – Temporary change of use of the basement from storage unit (Class B8) to an escape rooms (Class Sui Generis) – Granted 12/06/2017

#### 55 Camden Street

2010/1739/P – Change of use from Public House (Class A4) and associated ancillary accommodation on ground and first floors to provide a retail unit (Class A1) and 1 x 3 bedroom self-contained flat at ground floor level, and 3 x 1 bedroom self-contained flats at 1st floor (Class C3), including alterations to ground and first floor north, east and south elevations - Granted Subject to Section 106 Legal Agreement 24/08/2010

2010/5007/P – Submission of cycle and refuse storage pursuant to conditions 4 and 5 of planning permission dated 24/08/2010 (ref: 2010/1739/P) for change of use from Public House (Class A4) and associated ancillary accommodation on ground and first floors to provide a retail unit (Class A1) and 1 x 3 be(Class C3), including alterations to ground and first floor north, east and south elevations - Granted 28/10/2010

2010/5138/P – Change of use from retail unit (Class A1) to residential unit (Class C3), with associated alterations to east, north and south elevations at ground floor level – Granted Subject to Section 106 Legal Agreement 10/05/2011

### **Proposal**

Escape Rooms are a modern popular off beat form of entertainment which involve people working as a team to solve puzzles in order to escape from a locked room. The application proposes the change of use of a vacant storage unit (Class B8) to an escape room (Sui Generis).

This concept involves a team (up to 6 players per room- 3 rooms in total) being locked in a room and try to escape by solving puzzles/ mysteries and codes within a set time period (usually 60- 90mins). A maximum of 10 games per day is anticipated. The opening hours will be 10.00am – 23.00pm Monday-Sunday including bank holidays.

There is a holding area located within the premises by reception and it is unlikely that any music will be played. No food or alcohol will be served, only complimentary snacks and soft drinks if there is a demand.

The experience is set out in further detail within the submitted Operational Management Plan.

### **Design and Access Statement**

As noted above the site is not listed nor located within a conservation area.

The building front does not face directly on to Camden Street, but is reached via a short access road. Access is via an entry door at ground floor level and then steps will lead you down to the basement area. There is no disabled access possible into the unit nor a lift. The proposal is within an existing building

and not a proposal for a new development, as such the opportunity for changes to be made are limited in this regard. Appropriate facilities will be provided for the proposed customers including a toilet.

No external alterations are sought as part of this application. There is a small walled courtyard area at the front of the property attached to the unit.

### **Planning Policy Considerations**

Paragraph 38 states that “Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

The NPPF at paragraph 8 clarifies sustainable development principles as economic, social and environmental. The current proposal will contribute towards the aim of building a strong, responsive and competitive economy through adding variety to entertainment choice in Camden. The proposal contributes to the social role of the NPPF in supporting strong, vibrant and healthy communities through strengthening the entertainment provision and providing employment which supports the nearby town centre. The highly sustainable location of the site also means that there would be minimal environmental impact. Consequently, the proposal would not compromise sustainability objectives.

A key aim of the NPPF is to ensure the vitality of town centres and encourages directing leisure development towards town centre locations. Within Section 7 (Town Centres) sets out that planning policies should be positive and promote competitive town centre environments, including adding variety and providing customer choice.

The principal considerations material to the determination of this application are summarised as follows:

#### Land use

The basement site is currently vacant and has been for a number of years and was previously in use as storage space independent from the residential units above.

As noted above, permission has already been granted by the Council for an escape room (Sui Generis) use at this site in June 2017 which was assessed against current planning policy. This was never implemented. This permission however confirms that the Council has already agreed the proposed use in principle.

Local Plan Policy E2 aims to protect employment sites which provide employment opportunities. However, in exceptional circumstances the Council may agree that change of use is acceptable. The Council recognises that not all existing employment premises will be able to offer the same standards of accommodation as new build premises as noted within Camden Planning Guidance- Employment sites and business premise. The premises are in poor condition and considered unsuitable for continued storage use. In terms of access for storage the premises would qualify as a low category space, this is due to it being at lower ground floor level with no lift access or space for servicing. Whilst in an accessible location the surrounding area is predominately residential, therefore away from other supporting business uses. The site does not have any natural light passing into it and therefore would not be suitable for alternative uses such as C3 or B1a use. The proposal offers an increase in employment- minimum of

3 staff, boosting the number of available jobs in the community. The alternative entertainment use will provide variety, vibrancy and choice for residents, workers and visitors.

The proposal to create an 'escape room' within the basement would be an effective use of this constrained site and would conform with the aims of policy C3. The 'escape room' experience is rapidly gaining in popularity and has shown to attract a wide variety of groups. Policy C3 states that the Council will "seek opportunities for new leisure facilities and support the use of vacant buildings for leisure activities". "Smaller facilities may be appropriate anywhere in the Borough providing they do not have an adverse impact on the surrounding area or the local community."

It is also considered that the proposed use would contribute towards the 18-hour economy and will be an attractive activity to customers who will likely combine the experience with other activities such as eating out in the town centre. The proposed use would therefore complement the evening economy and increase the range of uses on offer to help cater for different sections of Camden's community. It also offers an alternative activity to drinking.

#### Neighbouring amenity

The proposal for the use as an escape room is likely to be less disruptive for neighbouring properties than previous uses at the site. The number of visitors will be relatively low and noise from the use will be largely isolated owing to its basement location.

A noise report has been submitted with the application that demonstrates that with sufficient soundproofing between the basement and residential above, the use would not create noise and disturbance to the neighbouring occupiers.

The applicant has submitted an Operational Management Plan addressing; arriving at/leaving the premises and control of sound. This includes; instructions in the booking confirmation email of details of public transport to and from the site, a waiting area within the premises for patrons, a sign requesting that patrons leaving the site do so quietly and respectfully, participants would be briefed on arrival about acceptable behaviour during games including noise levels, and monitoring during games via CCTV.

The proposed hours of operation are Monday – Sunday 10.00am – 23.00pm- this is in line with other 'escape room' venues within and outside of the borough. It should be noted that there will be no amplified music creating noise disturbance. The decision notice for 141 Kentish Town (2015/6923/P) stated that because Escape Rooms involve 'indoor entertainment activity that requires mental agility', the Change of Use would 'not cause negative harm to occupiers of neighbouring buildings'.

No external changes are proposed and therefore the proposal would have no impact on the current daylight, sunlight, privacy or outlook felt by neighbouring properties.

Given the location of the site in the basement of the building fronting onto Camden Street, it is considered any noise generated from the use would likely be minimal in accordance with policies A1, A4 and A5 of the Local Plan and the Councils CPG on Amenity.

#### Transport

The site has a PTAL rating of 6a (excellent) and as stated in the operational management plan customers are expected to use public transport to access the site. The unit does not benefit from access to private parking spaces although there is a small courtyard area to the front which could accommodate 2 spaces

if required. The use will primarily generate a small foot traffic with over a number of hours. Customers will be encouraged to arrive via public transport. It is therefore anticipated that the proposed use would not generate significant levels of vehicular movements. Given the relatively small scale nature of the proposal, the location of the premises (close to the town centre) and very close to a range of public transport links and public car park it is considered that the proposal would not have a significant impact on highway safety and capacity in accordance with policy T2 of Camden Local Plan and the Councils Transport CPG.

With regards to cycle parking there are no prescribed standards for Sui Generis noted within the London Plan and therefore these should be as per the most relevant other standard e.g. Class D2 (Table 6.3). This required 1 space per 100sqm- the unit is 130sqm therefore 1 space would be required. If requested by customers cycle parking may be able to be provided within the unit in accordance with Camden Local Plan Policy T1 and London Plan Table 6.3 however there is no step free access into the unit and no lift available.

### **Summary**

The use of the site as an entertainment venue on the borders of the town centre would be considered an improvement on the current vacant space and involves internal changes only.

The proposal has previously been considered acceptable at this location and would achieve the aims of the NPPF and the Local Plan through the introduction of a new leisure use which the central Camden area does not currently offer, increasing the variety of entertainment options in close proximity to the town centre in a highly accessible location. The increased variety will assist in drawing in additional visitors and increasing the use of, and spending within, the area.

In summary the proposed change of use is considered to be entirely appropriate to the site and would not result in harm to the character of the area or to surrounding neighbouring properties. We trust the Council has all the information required to validate and determine the application and we look forward to a swift and positive outcome. Should you however require anything further or wish to discuss the proposals in further detail please do not hesitate to contact the undersigned.

Yours faithfully

*Lucy Pitham*

On behalf of **Monmouth Planning Ltd**

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