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Dear Sir or Madam,

55B Camden Street. London, NW1 0HG

Full planning application seeking a change of use of the basement (existing B8 use class) to an escape room (Sui Generis) (130sqm)

On behalf of our client, IME Investments Ltd., please find enclosed a full planning application submitted for a change of use of the basement level of 55B Camden Street from storage unit (B8 Class) uses to an escape room (Sui Generis). The site was previously granted a 12-month temporary planning permission for a near-identical application in July 2019 (ref. 2019/2318/P), but due to contractual delays and the impacts of COVID, the applicant was unable to implement the permission successfully. Planning permission is now sought for identical uses on the site, with a minor amendment to the location of bicycle parking and slight changes to the location of internal partitioning walls, which are considered non-material.

This application is submitted electronically via the Planning Portal. The submission comprises the following documents in support of the application:

- This cover letter, prepared in full by Savills;
- Site Location Plan;
- Existing and Proposed Plans;
- Noise Report;
- Operational Management Plan;
- Community Infrastructure Levy Forms; and
- Enclosed application fee.

The application proposes a change of use to an escape room (Sui Generis use); a modern puzzle-solving entertainment use, wherein teams are required to work together to solve puzzles and riddles in a time-constrained setting, for up to one hour. Given the length of each individual 'game', it is anticipated that there will be no more than 9 games played daily at the escape room.

A thorough overview of all operational considerations is outlined within the submitted Operational Management Plan. A brief overview of key operational considerations is set out below:

- The proposed hours of operation for the escape room are Monday to Saturday from 10.00am to 23.00pm; and Sundays and Bank Holidays from 11.00am to 18.00pm;
- There will be a maximum of five players per team per room, with three individual escape rooms;
- No food or alcohol will be served on-site. If demand is sufficient, complimentary snacks and soft drinks may be provided.
- There will be up to three staff members on the premises at any one time when the unit is operational and open to the public.

The application is identical to that submitted in 2019 (ref. 2019/2318/P) excluding a minor amendment to the proposed cycle parking, which is now proposed to be mounted approximately one metre from its previously consented location. There is also a minor change to the proposed internal layout involving the relocation of partitioning walls.

It is important to note that despite the previous 2019 application seeking permission for the escape room to operate between from 10.00am to 23.00pm on both Sundays and Bank Holidays, the permission restricted the business from operating entirely on these days. The given reason was to “to safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, CC1, D1, A1 and A4 of the London Borough of Camden Local Plan 2017”. Acknowledging the perceived sensitivity of operating later hours on these days, whilst also seeking to allow the business to operate on these typically busy days, to ensure its viability, permission is now sought for the proposed escape room to operate between 11.00am to 18.00pm on these days. The proposed reduced operating hours on these days will ensure there is no impact on the amenity of nearby residents at sensitive times on these days.

Permission is sought for the use of the premises as an escape room (use class Sui Generis) on a permanent and ongoing basis.

The Applicant

The applicant proposing the change of use in question is IME Investments Ltd.

The applicant has successfully operated escape rooms elsewhere in London and in similar locations beneath residential units. In their experience, and as a result of the measures they have implemented to ensure the facilities are appropriately managed and acoustically insulated, the proposed use has not resulted in any unacceptable amenity impacts on adjoining residents.

Site and Surrounding Area

The application site in question is a storage unit located on the basement level of 55B Camden Street. The site was formerly in B8 Class use although currently the site lies vacant. The basement forms part of a basement plus three storey development, with all three floors above ground currently in residential (C3) use. The ground plus three storey building forms part of a wider development of flatted residential (C3) uses, located off of Camden Street.

The site is located within the London Borough of Camden (LBC), within a predominantly residential-use area. Camden Town Centre, providing retail and wider miscellaneous uses, is located to the west of the site.

The site is located within close proximity to public transport connections, including Mornington Crescent Underground Station (Northern Line) (6 minute walk), Camden Road Overground Station (Overground) (8 minute walk). Kentish Town West Overground Station and Euston Station (providing Overground and wider rail services) are both located approximately 15 minutes walking distance from the site. Bus routes 46 and 214 also serve Camden High Street Road, approximately a 4 minute walk to the west of the site.

Given the aforementioned public transport options in close proximity to the site, the site benefits from a Public Transport Accessibility Level (PTAL) of 6a, the second-highest accessibility classification, acknowledging the strong accessibility of the site.

Planning Designations

The site does not appear to be designated within Camden planning policy for any particular planning policy designations. The site lies outside of the Camden Town Conservation Area, which is located to the immediate west of the site on Bayham Street. The site is not statutorily or locally listed, nor are any of the adjacent buildings within the off-street residential development within which the site is located.

Camden Town Centre to the west of the site is designated as a recognised ‘Town Centre’ within the Camden Local Plan. The site lies outside of the Town Centre boundary.

Planning Application History

The site (55B Camden Street) has received two previous planning permissions for the change of use of the basement level from B8 use to as escape room (Sui Generis):

Ref:	Description	Decision
2019/2318/P	Temporary change of use of the basement from storage unit (B8) to an escape room (Sui Generis) for 12 months.	Granted 11-07-2019
2016/6442/P	Change of use of the basement from storage unit (B8) to an escape rooms (Sui Generis).	Granted 12-06-2017

Camden Council have also granted planning permission for escape rooms at several properties across the borough, including:

Ref:	Address	Description	Decision
2019/1558/P	181 Drury Lane, WC2B 5QF	Change of use from a shop (Class A1) to an 'Escape Room' (Sui Generis) at ground floor level (retrospective).	Granted 11-07-2019
2015/6923/P	141 Kentish Town Road, NW1 8PB	Change of use of the basement from storage unit (B8) to an escape rooms (Sui Generis).	Granted 05-04-2016

Design and Access Statement

As outlined within the 'Site Description' section of this Letter, the site in question is the basement level of a basement plus three storey development. The site does not front directly onto Camden Street.

All works proposed are to be undertaken within the basement level of the property. No external works to the front or rear of the property will be undertaken, with the exception of proposed secure cycle parking. This secure parking was requested by planning condition within the previous 2019 permission, and so provision of secure Sheffield stand cycle parking will also be provided within this application.

The premises will be accessed through the ground floor entry door. Stair access is provided for users to access the basement for the escape room purposes. Unfortunately, no wheelchair access is provided, given the constraints posed by developing only the basement level of the premises.

As outlined within the Operational Management Plan submitted with this application, there is a holding area proposed within the curtilage of the basement where users of the proposed escape room will congregate before and after entering the escape rooms. There will be no queueing outside the property or adjacent properties, reducing any potential for amenity impacts on nearby residents.

The applicant is proposing to provide one unisex toilet available to all users of the escape room.

Principle of Development

Decision-Making

National Planning Policy Framework (NPPF) Paragraph 38 advocates that local planning authorities should strive to approach determining development proposals in a positive and creative manner.

Decision-makers are encouraged to approve applications for sustainable development where possible. Section 2 of the Framework outlines the three components of what is deemed 'sustainable development'; namely, economic, social and environmental objectives. NPPF Paragraph 8 stipulates that opportunities should be taken to secure net gains across each objective.

Acceptability of Proposed Uses

The site has been subject to two previous planning permissions granted for identical escape room (Sui Generis) use. The most recent of these applications, being July 2019, was assessed against current LBC planning policy. Therefore, the principle for escape room uses at the site in question appears to have been agreed already. The acceptability of such uses may be further supported by the lack of any natural light passing into the basement level, thus restricting many other potential land uses, including E class office space and residential (C3) use.

Notwithstanding the above, NPPF Paragraph 80 advocates for significant weight to be placed on supporting economic growth, accounting for local business needs. London Plan Policy 4.1 and Draft London Plan (Intend to Publish) Policy GG5 lend support to proposals which contribute to a strengthened and increasingly diversified economy. Likewise, Draft London Plan (Intend to Publish Version) Policy GG2 states that to make the best use of land, those involved in planning must prioritise sites well-connected by public transport, and enable development of brownfield sites within and on the edge of town centres. At the local level, Camden Local Plan Policy G1 states that the Council will promote efficient use of land by “*expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough*”. Given the site benefits from a PTAL score of 6b, and is located on the edge of Camden Town Centre, the proposals on the site would help to encourage economic growth on a suitable brownfield site, and thus would comprise an efficient use of such land.

Camden Local Plan Policy E2 does stipulate that the Council will protect employment premises suitable for continued use, unless the site or building is unsuitable for its granted use, or if redeveloping the site for similar or alternative employment uses has been fully explored. Given the change of use for the site has been agreed on two previous occasions by Camden Council through submitted planning applications, and given the proposals will bring the site back into continued employment use (and significantly improve the condition of the basement space) the application is consistent with the criteria outlined in Policy E2.

Concerning the escape room use itself in regard of the above policies, Camden Local Plan Policy C3 offers support for new leisure facilities and in particular, will support “*the temporary use of vacant buildings for cultural and leisure activities*”. The application in question seeks a 12-month temporary planning permission for the site, which is clearly supported through Policy C3, and would revitalise the vacant and dilapidated storage unit. The site is currently used as a storage unit (B8 class use), but as previously stated, currently lies vacant and in a poor condition reflecting a lack of demand for the use in this location. The proposed use of the basement level as an escape room would facilitate the creation of three jobs, contributing to the wider strategic targets for economic growth outlined in London Plan Policy 4.1, Draft London Plan (Intend to Publish Version) Policy GG5 and Camden Local Plan Policies E1 and E2.

Impact on Residential Amenity

As identified previously, the basement within which the escape room is to be provided is located underneath a three storey residential development, within a wider predominantly residential area. Therefore, it is essential that the proposed uses would not cause detrimental impacts upon the existing residential amenity of the immediate area.

Draft London Plan (Intend to Publish Version) Policy D14 strictly states that development proposals are expected to manage noise primarily by mitigating and minimising potential adverse noise from new development and applying good acoustic design principles and measures. Section 6 of the Camden Local Plan also comprises policies relevant to protecting amenity from development within the borough. Policy A1 states that the council will seek to protect the quality of life of occupiers and neighbours, by expecting developments requiring mitigation to provide adequate measures to protect neighbouring amenity. Proposals which do not effectively mitigate potential adverse impacts relating from noise will be deemed unacceptable. Regarding the particular use of the site, Local Plan Policy C3 advocates that smaller leisure facilities may be appropriate anywhere in the Borough providing they do not have an adverse impact on the surrounding area or the local community.

The submitted Noise Report accompanying this application identifies a number of noise mitigation proposals which will ensure that noise generated by the operation and use of the escape room will not result in adverse impacts on surrounding residential amenity. Such proposals include the installation of a sound limiter, a distributed speaker sound system (involving more speakers to allow for lower volumes), robust loudspeaker mounting and the installation of bass cabinets. Likewise, the submitted Operational Management Plan outlines operational measures which will be enforced during the operation and use of the escape room to minimise noise disturbance. Such measures include the use of a holding room, to prevent queuing outside of the property (limiting resulting street-level noise), the

installation of notices reminding clients to limit noise in order to reduce nuisance, and the commitment to not play music (excluding ambient background sound) within the escape room. Additionally, there are no windows within the basement that are able to open, so sound will be contained within the basement level.

It is noted that the proposed noise insulation being provided to a high quality is essential not only in terms of minimising adverse impacts upon neighbouring properties, but also within the basement unit itself. For the business to successfully operate, the noise mitigation measures must be designed to a high quality in order to prevent noise moving between escape rooms which could have an adverse impact on the enjoyment of clients. Likewise, no sound will be able to travel between the escape rooms and the holding room, so again as to not ruin the escape room 'experience'.

Given the identified noise mitigation measures to be installed to protect residential amenity, and the various operating measures to be employed to further limit the potential for adverse noise impacts, it is deemed that the use of the basement as an escape room would not cause an adverse impact on the surroundings, and therefore conforms to all listed policies.

Concerning physical amenity impacts, including impacts to daylight, sunlight, overlooking and privacy of neighbouring properties, the proposals do not involve any external works, excluding the addition of Sheffield stands to support cycle parking at the premises, previously requested within planning application 2019/2318/P and approved by the Council. It is not expected that the addition of Sheffield stands will cause any detrimental amenity issues, with no other external works proposed.

Permitted Operating Hours

Concerning the operating hours of the proposed escape room, Paragraph 4.4 of the Delegated Report for approved planning application 2019/1558/P at 181 Drury Lane, WC2B 5QF concerning an above-ground escape room, outlines the agreement of LBC that amended operating hours of 10.00am to 23.00pm Monday to Sunday for the escape room were deemed acceptable. Whilst it is acknowledged that 55B Camden Street is situated within a predominantly residential-use area, it is noted that the ground-floor escape room permitted retrospectively at 181 Drury Lane is in close proximity to residential C3 uses present at both 180 Drury Lane and 182 Drury Lane (first floor and above), sharing a party wall with 180 Drury Lane in particular. Nevertheless, operating hours until 23.00pm were deemed acceptable by LBC despite the identified proximity to residential land uses.

Concerning approved planning application 2015/6923/P at 141 Kentish Town Road, NW1 8PB, Informative 1 of the Decision Notice outlines that given escape rooms require mental agility, such uses "would not cause negative harm to occupiers of neighbouring buildings". The Decision Notice for the application does not outline consented operating hours for the escape room - however, the online website for the escape room states at 141 Kentish Town Road states that the premises are operational from 10.00am to 22.00pm Monday to Sunday including Bank Holidays. Again, it appears that the escape room at 141 Kentish Town Road is in relatively close proximity to flatted development at 139 Kentish Town Road (albeit they do not share a party wall). Nevertheless, LBC adjudged that escape room activities could be undertaken on both Sundays and Bank Holidays until 22.00pm.

As previously discussed, the previously approved application at 55B Camden Street for identical escape room uses was prohibited from operating on both Sundays and Bank Holidays. Whilst the applicant is seeking to operate on both these days, they have acknowledged the potential concerns of LBC in regard to adverse impacts on neighbouring uses and on this basis permission is sought for reduced operating hours on both Sundays and Bank Holidays to 11.00am to 18.00pm. The applicant is seeking to operate on these given days to ensure the maximum commercial viability for the development, given that from their experience, these are typically amongst the busiest days to operate. Additionally, provided the raft of mitigation measures outlined within both the Noise Report and Operational Management Plan, the scheme will adequately mitigate any adverse impacts caused and thus accord with the requirements outlined in Camden Local Plan Policies G1, CC1, D1, A1, and A4.

It is therefore considered acceptable under the circumstances that the proposed use should be able to operate in accordance with the proposed reduced operating hours of 11.00am to 18.00pm on both Sundays and Bank Holidays.

Transport Considerations

Policy T2 of the Camden Local Plan seeks to limit the availability of car parking spaces within developments; new developments will not receive on-street or on-site parking permits. The policy aims to encourage car-free

development and public transport usage. Likewise, Policy 6.13 of the London Plan seeks to prevent excessive car parking provision that would otherwise undermine viable cycling, walking and public transport use.

As previously stated, the site benefits from a PTAL rating of 6a, demonstrating excellent public transport connectivity. Given the proximity to nearby rail and tube stations, and proximity to bus routes serving Camden Town Centre, the Operational Management Plan stipulates that customers are expected to utilise public transport to attend the site.

Given the limited number of users allowed in one room at a time, and a limited number of games a day, it is unlikely that the development will generate significant footfall on a daily basis, and thus is unlikely to consequently generate traffic levels which could cause adverse effects upon both highways capacity and safety.

Within the previous planning application for the site (2019/2318/P), a condition was implemented within the Decision Notice requesting that the secure cycle parking be implemented and retained permanently thereafter. Given the previous permission required cycle parking, the proposal will seek to provide secure cycle parking in line with previously submitted plans. The provision of secure cycle parking further encourages the use of sustainable modes of transport to visit the site, helping to promote a wider shift from car-dependent travel in line with Camden Local Plan Policies T1 and T2 and Policies T1, T2, T4 and T5 of the Draft London Plan (Intend to Publish Version).

A minor alteration to the previously approved secure cycle parking plans, which is deemed non-material, is the repositioning of a Sheffield cycle parking stand by approximately one metre. The intent of this is provide greater clearance to the entrance to the premises.

Next Steps

We trust that the information enclosed within this letter, and the wider documents submitted as part of this application, is in order and look forward to receiving confirmation that all documentation pertinent to the application has been received and validated in a timely manner.

Should you require any further information required to validate or determine the application, or if you wish to discuss any details of the proposal further, please do not hesitate to contact the undersigned.

Yours sincerely

A handwritten signature in black ink, appearing to read "Taylor Vernon", written in a cursive, flowing style.

Taylor Vernon
Senior Planner