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FAO: Laura Hazelton

17 December 2020

Our ref: LJW/NFD/AKG/AJA/U0014625

Your ref: PP-09257326

Dear Laura

**Town and Country Planning Act 1990 (as amended)
Planning (Listed Buildings and Conservation Areas) Act 1990
Lower Basement and Upper Basement of the Atrium Building, Stables Market, Camden,
London, NW1
Application for Full Planning Permission**

On behalf of our client, Camden Market Estate Holdings Limited (the 'Applicant') we enclose the following applications for planning permission in respect of the use of Lower Basement and Upper Basement of the Atrium Building, Stables Market, Camden, London, NW1 (the 'Site'):

"Use of the site as family entertainment (sui generis) use."

No external physical works are proposed as part of the planning application. The planning application will not create any new gross internal floorspace.

Site and Surroundings

The site subject to this application is located within Camden Town and the Regents Canal Conservation Area.

Background

The site is contained within a large mixed-use building in the heart of Camden Town. The basement level was originally intended for Class B8 use. However, it was always the intention that the B8 floorspace would be used for retail storage.

The Proposal

The proposal seeks to provide a vibrant new leisure use within Stables Market which would attract a wider range of visitors to the Market and contributing to the function and vitality of the wider Stables Market. The proposal also represents an important step in the Applicant's objective of improving the night-time economy for the town centre by securing high quality operators who mix food and beverage operations with leisure and cultural attractions.

The operator, Little Lion Entertainment, already has several locations throughout the UK, including Angel, Islington, Shaftesbury Avenue, Westminster in London. This operator specialises in themed experiences. The proposed experience for this site is that of an 'escape room' where participants will be guided through a set and will complete a variety of activities.

The tenant has teamed up with Rebellion Studios, a major film and software company who market the 'Judge Dredd' brand to deliver an escape room experience themed along the 'Judge Dredd' comic book character.

Should the operator leave the site, the Applicant wants the flexibility to have another family entertainment tenant at the site.

The proposals would lead to the following land use floor area changes at the sites:

Land Use	Existing (GIA sqm)	Proposed (GIA sqm)	Uplift (+/-)
Class B8	3,736	0	-3,736
Family Entertainment (sui generis)	0	3,736	+3,736
Total	3,736	3,736	0

Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. The statutory development plan consists of:

- i. The National Planning Policy Framework ('NPPF') (as updated February 2019);
- ii. The London Plan, being the Spatial Development Strategy for Greater London (2016); and
- iii. The Camden Local Plan (2017).

Relevant supplementary planning guidance for the site includes the Regent's Canal Conservation Area Appraisal and Management Strategy (2008).

Camden are currently consulting on various Camden Planning Guidance documents.

Planning Assessment

Land Use - Loss of Class B8 floorspace

Camden Local Plan Policy E2 protects business sites which provide employment for Camden residents. Policy E2 goes on to state that Camden will resist development of employment sites for non-business use unless it is demonstrated that (a) the site or building is no longer suitable for its existing business uses and (b) that the possibility of retaining, re-using or redeveloping the site for a similar or alternative type and size of business use has been fully explored over an appropriate period of time.

The Class B8 floorspace approved under planning permission ref: 2006/3182/P, dated 11 October 2006, has never been operated for Class B8 use. Furthermore, the site and the immediately surrounding area do not

have the required characteristics and infrastructure to support Class B8 use, such as a loading bay or servicing routes.

The loss of the Class B8 floorspace at the site is considered theoretical and therefore acceptable for the following reasons:

- i. There will be no loss of employment for Camden residents;
- ii. The site and the immediately surrounding area are not considered suitable for Class B8 use because there is no dedicated loading or servicing bay in-situ;
- iii. LabTech are seeking to revitalise the wider Stables Market for town centre uses given its location within the designated Camden Town Centre. The Local Plan does not define Class B8 use as a main town centre use. The site is therefore not considered an appropriate location for Class B8 use; and
- iv. The use was never implemented and there is no actual loss of Class B8 floorspace as a result.

As such, the proposed change of use of this floorspace is in line with Camden Local Plan Policy E2.

Land Use – Family Entertainment

The proposed use of the site is for family entertainment.

Ancillary events are also proposed as part of Lion Entertainment's occupation of the site and the upper basement level will have an ancillary, themed retail element.

In terms of land use the key matter in respect of the proposed use is: the introduction of a new family entertainment use at the Stables Market.

The Intend to Publish London Plan Policy HC6 promotes the night-time economy where appropriate and particularly in town centres. Local Plan Policy TC2 states Camden will seek to protect and enhance the role and unique character of each of Camden's centres and will seek to 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. Local Plan Policy TC6 sets out that the Council will consider the character of the existing market when assessing proposals for the refurbishment and redevelopment of markets. Paragraph 9.35 states that new entertainment uses can add to the vitality and vibrancy of Camden's centres.

The proposed family entertainment (sui generis) use is an acknowledged main town centre use within the Camden Local Plan (paragraph 9.33). Given that the site is located within Camden's town centre where a mix of town centre uses is supported the proposed use is considered acceptable in principle.

The proposed use would also attract locals/Londoners/families and tourists to the market and would therefore contribute to and support the function of the market and would not harm the character and appearance of the market in line with Local Plan Policy TC6.

Overall therefore the proposed use is acceptable in principle in line with Camden's Local Plan policies.

Operational Management

Little Lion Entertainment have prepared an Operational Management Plan (OMP).

The OMP sets out the opening hours, servicing and delivery details, waste strategy, staff numbers, number of visitors, dates on which theatre performances will take place and crowd/queue management. The tenant will be required to operate the site in line with the OMP via their lease.

Amenity – Air Quality

Camden Local Plan Policy CC4 states that the Council will ensure that the impact of development on air quality is mitigated.

Wardell Armstrong have undertaken an air quality review of the proposals which considers the potential for air quality impacts during the construction and operational phases of the proposed development.

The air quality assessment demonstrates that the proposed development will accord with local and national planning policy and will not lead to an unacceptable risk from air pollution and that there are no material reasons in relation to air quality why the proposed scheme should not proceed.

Sustainability

Camden Local Plan Policy CC2(h) states that the Council will promote and measure sustainable design and construction by expecting non-domestic developments of 500sqm of floorspace or above to achieve 'excellent' in BREEM assessments and encouraging zero carbon in new development from 2019.

The BREEAM pre-assessment, prepared by Scotch Partners LLP demonstrates that the scheme will achieve a policy compliant 'excellent' baseline BREEAM rating of 73.35%.

The Sustainability Statement, also prepared by Scotch Partners LLP outlines the energy and sustainability strategy for the site and demonstrates that the proposals will align with the Camden Local Plan and Intend to Publish London Plan standards. Sustainability indicators at the site include: A low carbon energy strategy in accordance with the hierarchical approach to reducing CO2 emissions that will achieve at least a reduction of 35% against Part L, with an aspiration towards zero carbon by 2030; target BREEAM excellent; and a water use reduction strategy.

Enhancing the Stables Market

Local Plan Policy TC2 states Camden will seek to protect and enhance the role and unique character of each of Camden's centres and will seek to 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. Local Plan Policy TC6 states that the Council will consider the character of the existing market when assessing proposals for the refurbishment and redevelopment of markets.

The proposals are in line with Camden local policies TC2 and TC6 as they will support and improve the continued function of the Site within the Stables Market. The diversification of the Stables Market offer will enhance the vitality and activity within this part of the market. The proposed uses will also act as an anchor drawing people through the market to this location and attracting a wider range of visitors which will help contribute to securing the Stables Market's long-term future.

Conclusion

The development can be seen to contribute to the diversification of the Stables Market in line with Camden's town centre and market planning policies and is one which will encourage a new range visitors to the market, so contributing to the success of the market at large and to the appreciation of its heritage assets in line with Local Plan Policies D2 and TC6.

In line with the Camden Renewal Commission's objectives to deliver a thriving local economy and support the success of local businesses, the introduction of the proposed uses to this location will improve footfall to the site's immediate area and as a consequence will contribute to the turnover of smaller retailers in the Stables Market.

It is considered that the proposals for which planning permission is sought complies with the relevant statutory tests and planning policies within the Camden Local Plan. It is considered that there are no material considerations of sufficient weight to determine that the application is other than in accordance with the Development Plan, on this basis, planning permission should be granted for the application accordingly.

Supporting Documents

In support of each of the applications, we enclose the following documents:

- Completed Application Form and certificates;
- Site Location Plan, prepared by Labtech;
- Completed CIL Form, prepared by Gerald Eve;
- Existing and proposed plan drawings, prepared by LabTech;
- Air Quality note, prepared by Wardell Armstrong;
- Sustainability Report, prepared by Scotch Partners LLP;
- BREEAM pre-assessment, prepared by Scotch Partners LLP; and
- Operational Management Plan, prepared by Hartshorn Hook

The requisite application fee (**£462**) have been paid online using the planning portal.

We look forward to receiving confirmation of registration and validation of the applications in due course. In the meantime, please do not hesitate to contact Anna Gargan (020 7518 7240) or Andrew Jackson (020 486 3734) of this office should you have any questions regarding the above.

Yours faithfully,



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