

Address:	60-70 Shorts Gardens London WC2H 9AH		2
Application Number(s):	2025/2758/P	Officer: Elaine Quigley	
Ward:	Holborn and Covent Garden		
Date Received:	24/06/2025		
Proposal:	Change of use of the lower and upper basement, ground and mezzanine floors to use the existing floorspace for an immersive experience venue with associated ancillary facilities including a bar area, retail and office space (sui generis) (RETROSPECTIVE).		
Background Papers, Supporting Documents and Drawing Numbers: Existing: 1087_PL-GA-LB; 1087_PL-GA-UB; 1087_PL-GA-00; 1087_PL-GA-0M Proposed: P-IE-TTLE-25-005 rev D; P-IE-TTLE-25-004 rev D; P-IE-TTLE-25-002 rev D; P-IE-TTLE-25-006 rev C; P-IE-TTLE-25-003 rev E Documents: Covering letter produced by Lichfields dated 24/06/2025 (ref 15019/01/BK/TJ/33868981v1); Operational Management Plan for The Traitors: Live Experience; Marketing Note prepared by Bluebook and RX London dated 14/08/2025.			
RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a Section 106 Legal Agreement			
Applicant:		Agent:	
C/O Agent 21 Mincing Lane London EC3R 7AG		Lichfields The Minster Building 21 Mincing Lane London EC3R 7AG	

ANALYSIS INFORMATION

Land use floorspaces		
	Use Class / Description	Floorspace (GIA sqm)
Existing	Flexible B1 / D1/ D2	699 sqm

	(Business / Restricted Non-Residential Institution and Assembly and Leisure)	
	Flexible D1 / D2 (Restricted Non-Residential Institution and Assembly and Leisure)	610 sqm
	Flexible A3 / A4 (Food and Drink / Drinking Establishment)	100 sqm
	TOTAL (All uses)	1,409 sqm
Proposed	Sui Generis (Interactive entertainment with associated ancillary facilities including a bar area, retail and office space)	1,376 sqm
	TOTAL (All uses - excluding stair cores, risers and lifts)	1,376 sqm

Parking details				
Type	Existing spaces	Proposed long stay	Proposed short stay	Difference
Car parking	0	0	0	0
Cycle parking (non-residential)	0	0	0	0

EXECUTIVE SUMMARY

- i) The application site relates to the lower and upper basement and ground and ground floor mezzanine levels of no. 60-70 Shorts Gardens. The building has recently been refurbished following on from planning permissions granted in 2018 and a variation to the scheme in 2020 for a larger site including 60-70 Shorts Gardens and 14-16 Betterton Street for refurbishment, extension and alterations for mix of uses including B1, A1, A3/A4 and D1/D2 and new residential flats (2017/2204/P and 2019/3501/P).
- ii) The 2019 permission has been implemented with the completion of the roof extension, the internal works, and the fit out of one of the office floors. Despite being marketed for over 12 months, the commercial floors (1943 sq. m) within the upper floors of no. 60-70 Shorts Gardens have remained vacant since the refurbishment was completed in June 2024.

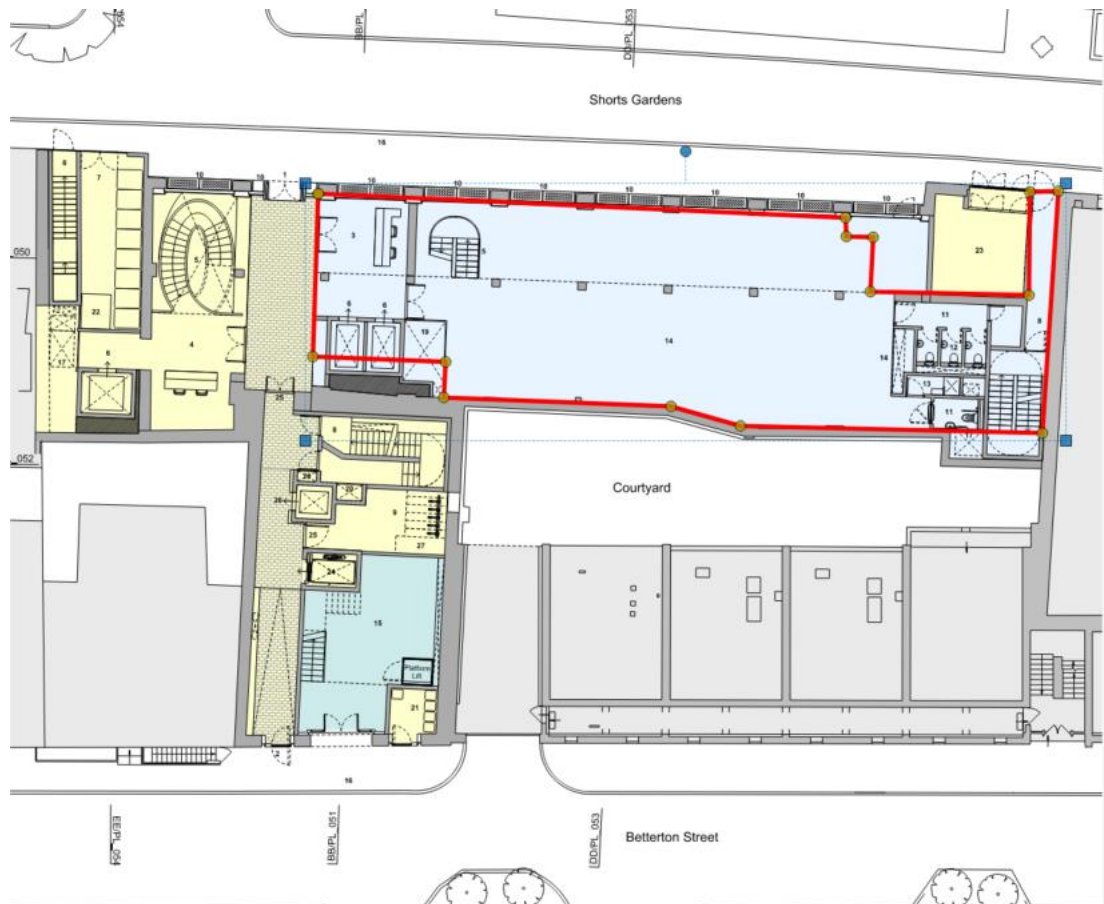


Figure 1 (above): The area outlined in red shows the extent of the ground floor element of the current planning application within the wider context of the Ground floor plan approved as part of the 2019 planning permission.

- iii) In order to assist in the letting of the basement and ground floor levels of the development (4 floors including mezzanine and lower basement) to an identified occupier, the applicant is seeking a change of use from flexible restricted uses within non-residential institutions (D1), assembly and leisure (D2), restaurant and café / drinking establishment (A3/A4) and offices (B1) to interactive entertainment which includes immersive experiences containing team challenges. The proposed experience is based on the Traitors television show. This use would be considered 'sui generis' falling outside of any one of the defined use class categories.
- iv) Permission is needed for this change of use as, although similar in nature to the approved uses in many aspects, the proposed use is considered materially different in planning terms.
- v) The development would include 89.5 sq. m of office space at upper ground floor level used by the staff. This would theoretically result in the loss of 167.5 sq. m of office floorspace that was required to be provided within the ground / ground floor mezzanine floors as part of the 2017 and 2019 permissions. The proposed loss of office space is acceptable given that 2,000 sq. m of new office floorspace is retained on the upper floors of the building from the previous consent. The immersive experience will support employment and align with Camden's

economic and cultural objectives. The proposal would result in the loss of flexible D1/ D2 floorspace, although these uses have never been provided on site, and the loss is therefore a theoretical one which would not result in the loss of existing businesses. Given the location of the proposed use at basement and ground floor levels it would be similar in character and impacts as the approved flexible uses within these floors at the site. The proposal would protect and enhance the role and unique character of Covent Gardens, contributing to the variety, vibrancy and choice within the area for residents and visitors. The proposed use would not cause harm to the character, function, vitality and viability of this central London location, and as such, is considered appropriate.

- vi) The development does not involve any external alterations or extensions. As such, it would not impact the character or appearance of the host building, wider markets, or this part of the Covent Garden Conservation Area.
- vii) Because of the location below ground, the staggered entry and departure times, the entertainment style use with limited space to congregate post-event, the potential disturbance arising from the proposed use and from customers entering and vacating the site is considered to be limited. Although the proposed bar area at ground floor level would serve alcohol, the predominant use of the site would be the entertainment function and the proposed bar area would be an ancillary element of this and would be limited to patrons only. An operational management plan would be secured to help ensure the use operates as intended and to mitigate any potential amenity issues. As such, it is not considered to alter the character of the area or unduly impact neighbouring amenity.
- viii) Subject to the suggested conditions and obligations including an Operation Management Plan, car-free and coach free development, travel plan and pedestrian, cycling and environmental improvements secured by legal agreement, officers are satisfied the proposed development would be operated without resulting in harmful disturbance to neighbouring occupiers.
- ix) As such, the proposed development complies with the development plan as a whole and is recommended for approval.

OFFICER REPORT

Reason for Referral to Committee:

Change of use resulting in provision of more than 1,000sqm of non-residential floorspace (Clause 3(ii)).

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Central London Local Area	Covent Garden
Central London Area	Central London Area (Clear Zone Region)
Conservation Area	Seven Dials (Covent Garden)
Archaeological Priority Area	Tier 1
Contaminated Sites Potential	1965-1971 Electrical Substation
PTAL (Public transport accessibility)	6b
CMP Priority Area	South of Euston Road
Cross Rail Area	Cross Rail 1
Underground development constraints and considerations	Subterranean (groundwater flow) and Slope stability

Table 1 - Site designations and constraints

Description

1.2 The application site covers an area of approximately 0.031 hectares (310 sqm). The site fronts onto Shorts Gardens and is in close proximity to Drury Lane that lies to the east and Endell Street that lies to the west. To the rear of the site are properties that front onto Betterton Street. Shorts Gardens is located within the Seven Dials Covent Garden Area and includes a number of listed buildings, including the Grade II* 24 Betterton Street and 33 Betterton and 22 Endell Street which are both Grade II. The application building makes a positive contribution to the character and appearance of the conservation area as well as a number of other buildings along the street including nos. 15, 21, 41, 43, 45, 52-58, and LEB substation.

1.3 The application building comprises a three-storey building with recently constructed 2 storey set back roof extension. It is reflective of the area, retaining an architectural vernacular linked with its 19th / 20th century

industrial past. The building was most recently occupied by office uses. The 2017 planning permission (2017/2204/P) and the 2019 s73 minor material amendment permission (2019/2501/P) approved a range of commercial and other uses within the building including

- 1943 sq. m of Class B1a (at the time of the consent) offices;
- 100 sq. m of Class A3 / A4 (at the time of consent) food & drink;
- 699 sq. m of Class B1a / D1 / D2 (at the time of consent) offices, non-residential institutions restricted to art galleries, museums, libraries or assembly; and leisure restricted to viewing cinema, seated concert venue or a member's social club.
- 610 sq. m of Class D1 / D2 (at the time of consent) non-residential institutions restricted to art galleries, museums, libraries or assembly; and leisure restricted to viewing cinema, seated concert venue or a member's social club.

1.4 Classes A1, A3 and B1 have since been amalgamated into a new planning use class, Class E which provides flexibility to switch between uses of this nature without the need for planning permission. Class D1 was split out to fall partly within the new Class E(e-f) and partly within F1 (community and learning).

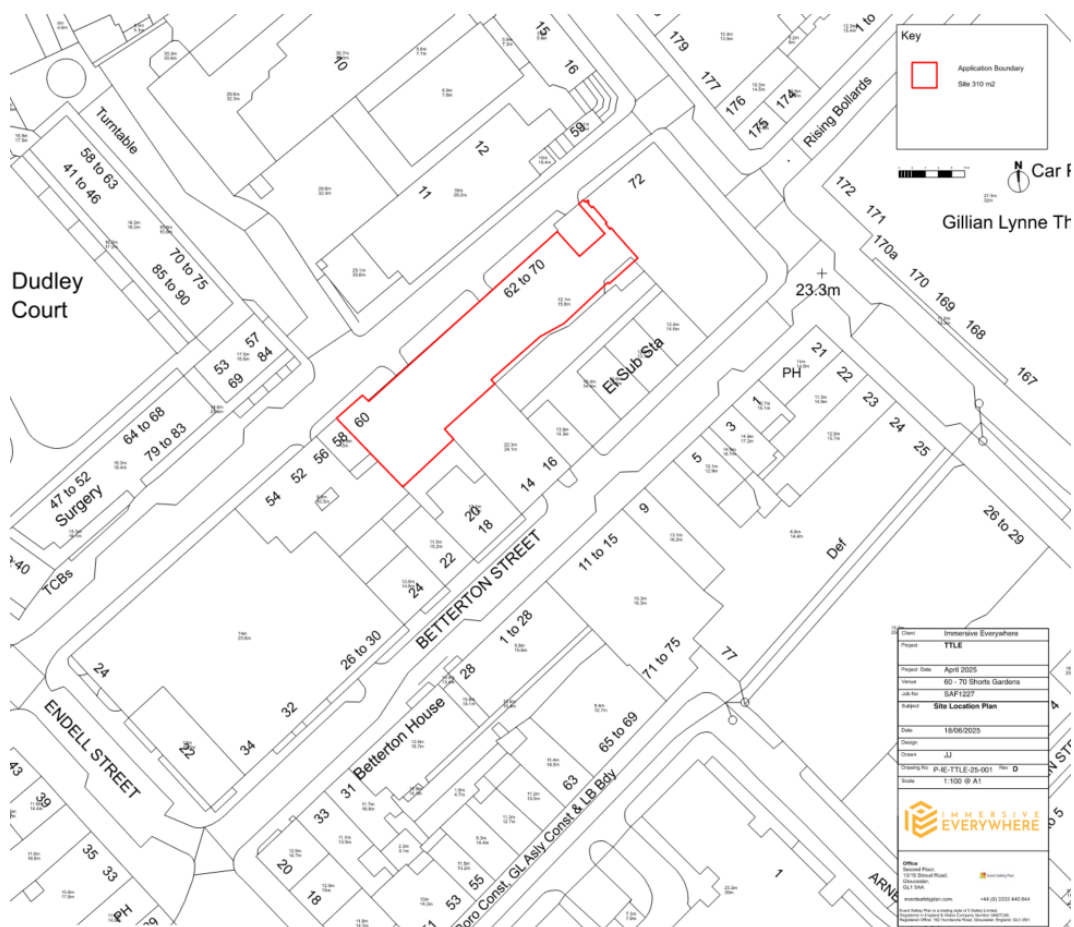


Figure 2 – The existing site

- 1.5 The application site comprises the upper and lower basement levels and upper and lower ground floor levels of the building for which the approved uses granted by the 2017 and 2019 permissions are set out in table 2 below. The building (including the office space at upper floor levels) has been vacant since the refurbishment works were completed in June 2024 and the permitted uses have not yet been instituted.

Floor level	Approved Uses
Lower basement floor	D1/ D2 flexible use A3 / A4 use (100 sqm)
Upper basement floor	D1 / D2 flexible use
Ground floor	B1, D1 / D2 flexible use
Upper ground mezzanine floor	B1, D1 / D2 flexible use

Figure 3: Details of approved uses by floor

- 1.6 The upper four storeys of the building - 1st, 2nd and two added roof storeys after the 2017 and 2019 permissions are approved for office use. The internal works to the office floors of the building have been completed but currently remain vacant.
- 1.7 The wider area comprises a mix of uses including residential, retail, food and beverage and restaurant uses, leisure uses and employment floorspace. The site abuts a larger building to the North-East, currently occupied and in use by EDF energy. This property houses a number of large transformers and is fairly visually obtrusive along its Betterton Street elevation. The Conservation Area Statement regards this adjacent block as being an 'opportunity site'. Opposite the site is the Travelodge Hotel and to the west is Dudley Court, a large residential block.
- 1.8 The application site is located in Central London Area and has an excellent Public Transport Accessibility Level (PTAL) of 6b (Excellent). The nearest London Underground Stations are Covent Garden station which is located approximately 0.2 miles to the south, Leicester Square which is 0.3 miles to the southwest and Holborn which is located 0.3 miles to the northeast. Numerous bus routes serve Charing Cross to the west, the Strand to the east and New Oxford Street to the north.

2. THE PROPOSAL

2.1 Planning permission is sought for the use of the upper and lower basement and ground and ground floor mezzanine floor levels (4 floors) as an interactive entertainment and immersive experience with ancillary uses (Sui Generis). The site would be operated by Venues Everywhere Limited and would be the venue for immersive experiences over the next 10 years. The first experience is the Traitors: Live Experience which started operating from the site in mid-July 2025 making this a wholly retrospective application at the time of bringing this to committee.

2.2 The lower and upper basement levels would be used for the immersive experience activities. The ground floor would include the entrance, ticket area, bar area for coffee, teas and alcoholic / non alcoholic beverages and a merchandising area. The bar area has been identified on the proposed plans and would be limited to 91.6 sqm. The ground floor mezzanine would include back of house space, office space, staff room and open plan flexible space associated with the overall use. The office space would measure approximately 89.5 sqm but there is flexibility to use part of the overspill area at this level for company team building events and seminars. A breakdown of the floor areas are detailed below:

Floor	Proposed GIA (sqm)
Lower basement	372 (immersive experience)
Upper basement	331 (immersive experience)
Ground floor	269 (entrance, ticketing area, bar area, and merchandising area)
Mezzanine	404 (back of house area, office space, staff room and open plan flexible space)
TOTAL	1,376

Figure 4: Proposed floor areas

2.3 The experience will open 6 days a week from Tuesday to Sunday. No members of the public will be onsite on Mondays however staff may be present on site for cleaning, maintenance and to take any deliveries.

2.4 There will be 6 performances a day which are detailed in the table below.

Entry Slot	Time
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Site open for early arrivals	09:30
Morning Entry Slot	10:00
Midday Entry Slot	12:00
Afternoon Entry Slot	14:00
Late Afternoon Entry Slot	16:00
Early Evening Slot	18:00
Evening Slot	20:00
Closing	22:30 (Sunday – Thursday) 23:30 (Friday – Saturday)

Figure 5: Proposed opening and closing times with performance slot times

2.5 No external works are proposed as part of the proposals.

3. RELEVANT HISTORY

The site

3.1 **2019/3501/P** - Variation of condition 3 (approved plans) of planning permission 2017/2204/P dated 07/11/2018 for redevelopment including refurbishment and extensions to provide a mix of B1 /A1 /A3 /A4 / D1/ D2/ C3 uses – namely to alter internal layouts, external elevation treatment and roof extension form and scale. **Granted subject to S106 legal agreement** on 13/01/2020.

3.2 The permission included a number of conditions to restrict and control the approved uses both in terms of the floor area size / location within the floors as well as the use type and its operation. These were attached to the original 2017 planning permission (details below) and were also carried over to the 2019 permission. The relevant conditions and their wording are detailed below:

Condition 13 – size restriction on A3 / A4 use

Prior to the commencement of any use at basement levels with Shorts Gardens, a Occupancy and Use Plan detailing how the flexible A3/A4 use will operate together with the flexible restricted D1 and D2 uses shall be

submitted to, and approved by the Local Planning Authority in writing. Under no circumstances shall the flexible A3/A4 uses exceed 100sqm in accordance with the approved scheme.

Reason: To ensure that the mix of uses proposed at basement levels are designed to successfully operate in tandem and to safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, A1, A4, D1, C2, C3, TC1 and TC2 of the London Borough of Camden Local Plan 2017

Condition 17 – use restrictions

Notwithstanding the provisions of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision in any statutory instrument revoking and re-enacting that Order with or without modification, the basement, basement mezzanine, ground floor and ground floor mezzanine areas to the premises at Shorts Gardens shall only be used for uses within classes B1, flexible A3/ A4 (to areas shown on approved basement plans only), or as art galleries, museums or libraries (restricted D1), or viewing cinema, seated concert, venue or a members social club (restricted D2), and not for any other purpose within classes D1/ D2 of that Order.

Reason: To safeguard the amenities of the neighbouring premises and the area generally in accordance with the requirements of policies G1, A1 and A4 of the London Borough of Camden Local Plan 2017.

Condition 18 – quantum of office floor space

Notwithstanding the flexible uses to ground and mezzanines floors of the Shorts Gardens property hereby permitted, a minimum quantum of 2,200 sq. m (GIA) across all floors of the Shorts Gardens property shall be retained for office purposes (B1).

Reason: To safeguard the existing employment function of the site and ensure that the development does not result in the reduction to existing quantum of office employment space across the site in accordance with the requirements of policies G1, E1 and E2 of the London Borough of Camden Local Plan 2017.

Condition 19 – hours of operations of uses

The class D1, D2, A3 and A4 uses hereby permitted shall only be operated between the following times: Mondays – Thursdays 08:00 – 22:30 hrs; Fridays and Saturdays 08:00 – 23.30 hrs; and Sundays and Bank Holidays; 09:00 – 22:30 hrs.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, CC1, D1, A1, A4, TC1 and TC2 of the London Borough of Camden Local Plan 2017.

Condition 21 – Noise

Noise levels at a point 1 metre external to sensitive facades shall be at least 5dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 10dB(A) below the LA90, expressed in dB(A).

Reason: To safeguard the amenities of the [adjoining] premises [and the area generally] in accordance with the requirements of policies G1, CC1, D1, and A1 of the London Borough of Camden Local Plan 2017.

Condition 23 – plant equipment anti-vibration measures

Prior to use, plant equipment and any associated ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced. All such measures shall thereafter be retained and maintained in accordance with the manufacturers' recommendations.

Reason: To safeguard the amenities of adjoining premises and the area generally in accordance with the requirements of policy G1, A1, A4, D1 and CC1 of the London Borough of Camden Local Plan 2017.

Condition 24 – time clocks on kitchen equipment

Prior to the commencement of the use of the kitchen extract equipment, automatic time clocks shall be fitted to the equipment/machinery hereby approved, to ensure that the plant/equipment does not operate between 23:00hrs and 07:00 hrs. The timer equipment shall thereafter be permanently retained and maintained and retained in accordance with the manufacturer's recommendations.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, D1, A1, TC1, TC2 and A4 of the London Borough of Camden Local Plan 2017

Condition 25 – servicing

All servicing shall take place in accordance with the approved serving management plan and shall not take place outside of the following times:

08:00-20:00 Monday-Saturday, and 09:00-20:00 Sundays and bank holidays.

Reason: To avoid obstruction of the surrounding streets and to safeguard amenities of adjacent premises in accordance with the requirements of policies A1 and T4 of the London Borough of Camden Local Plan 2017

Condition 26 – Noise break out

No music shall be played on the premises in such a way as to be audible within any adjoining premises or on the adjoining highway.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, CC1, D1, A1, A4, TC1 and TC2 of the London Borough of Camden Local Plan 2017.

- 3.3 **2017/2204/P** - Refurbishment, extension and alteration of 60-70 Short Gardens and 14-16 Betterton Street including two storey roof extension to both properties and the installation of new mezzanine floors, refurbishment of vacant basements and the demolition and replacement of the redundant 'vent shaft' building to Shorts Gardens. Provision of mix of uses to 14-16 Betterton St including flexible retail and non-residential institution (A1/D1) at ground and ground floor mezzanine and no.4 self-contained residential flats (3x 2bed 4person, 1x 3 bed 6 person – C3). Provision of mix of uses to 60-72 Shorts Gardens including flexible restricted D1/D2 and flexible A3/A4 at basement level, flexible restricted D1/D2 at basement mezzanine, flexible B1 and restricted D1/D2 at ground and ground floor mezzanine and office (B1) at 1st – 4th floors. Associated refuse, cycle, plant and substation provision. **Granted subject to S106 legal agreement** on 07/11/2018.
- 3.4 **2012/1533/P** – Application to extend the time limits for implementation of planning permission ref 2008/1401/P. **Granted subject to s106 legal agreement** on 25/02/2013.
- 3.5 **2011/1031/P** – Alterations including installation of a mezzanine level for use as a studio (Class D2) and installation of a new shop front on to Betterton Street at ground floor level. **Granted subject to s106 legal agreement** on 07/10/2013.
- 3.6 **2008/1401/P** – Alterations, extension (including roof extensions) and refurbishment of existing commercial / office use (Class B1), partial change of use to create small units (Class A1/A2 and D1), and change of use of basement to either B1/D1 or D2 use – **Allowed on appeal against non-determination subject to s106 legal agreement** on 21/04/2009.

4. CONSULTATION

Statutory Consultees

Transport for London

- 4.1 No comment to make on the application as it lies outside the Crossrail 2 Safeguarding area.

Local groups

Seven Dials Conservation Area Advisory Committee (CAAC)

- 4.2 No response received

Covent Garden Community Association (CGCA)

- 4.3 The CGCA confirmed that they don't object to the principle of the change of use as long as planning conditions are attached to protect residential amenity in the vicinity as potential capacity at the venue could exceed 350 people and could cause a serious nuisance to residents at Dudley Court and the bedrooms of the adjoining hotel. Conditions that were attached to the 2017/2240/P permission should be reattached including condition 21 (noise control); condition 23 (plant equipment and anti-vibration); condition 24 (time limit on kitchen extract equipment). Rewording of conditions 19 (hours of opening) to reflect times in the submitted operational management plan; condition 26 (no music) relating to no audible music outside the site to include the word "amplified" to cover things such as sporting events and condition 25 (servicing) be reworded to ensure there is no unacceptable disturbance to residents at the weekend.

Officer response:

- *Conditions 21 (noise control), 23 (plant equipment and anti-vibration), and 24 (time limit on kitchen extract equipment) that were attached to the 2017 and 2019 permissions would be reattached to this permission. The hours of operation, delivery and servicing requested by the applicant are considered reasonable in this Central London location and are in line with the 2017 and 2019 permissions. The restriction on noise from any music condition (condition 26) attached to the 2017 and 2019 permissions would be reworded to include the words "amplified sounds".*

Adjoining occupiers

- 4.4 Three sites notice were displayed outside the building on Shorts Gardens, Betterton Street and outside Dudley Court. The notices were displayed on 15/07/2025 until 08/08/2025 and the application was advertised in the local paper on 17/07/2025 (expiring 10/08/2025).
- 4.5 One objection was received from a local resident in Betterton Street. The key issue raised is listed below:

- Impact on neighbouring amenity -namely, concerns about the opening of another bar and the potential anti-social behaviour associated with this (screaming, shouting, puking, brawling, smashing glasses and vehicles). This causes locals distress and sleepless nights.

Officer response:

- *It is important to note that the bar forms a small ancillary component of the wider immersive cultural use. The overall floorspace of the proposed use is approximately 1,300 sq. m, whereas the bar area constitutes less than 100 sq. m – accounting for under 8% of the total floorspace. It is not proposed as a standalone bar venue, but rather as a supporting facility intended to complement the visitor experience, with access limited to ticketholders participating in the immersive event. There is only 1 entrance into the venue which fronts onto Shorts Gardens and this is maned by a security guard during the opening times.*

5. POLICY

National and regional policy and guidance

[National Planning Policy Framework 2024 \(NPPF\)](#)

[National Planning Practice Guidance \(NPPG\)](#)

[London Plan 2021 \(LP\)](#)

[SD6 Town centres and high streets](#)

[SD7 Town centres: development principles and Development Plan](#)

[Documents](#)

[D11 Safety, security and resilience to emergency](#)

[D14 Noise](#)

[SI 1 Improving air quality](#)

[SI 2 Minimising greenhouse gas emissions](#)

[SI 4 Managing heat risk](#)

[SI 5 Water infrastructure](#)

[SI 12 Flood risk management](#)

[SI 13 Sustainable drainage](#)

[T4 Assessing and mitigating transport impacts](#)

[T5 Cycling](#)

[T6 Car parking](#)

[T6.4 Hotel and leisure uses parking](#)

[T7 Deliveries, servicing and construction](#)

[London Plan Guidance \(LPG\)](#)

[Accessible London SPG](#)

[Air quality neutral LPG](#)

[Be Seen energy monitoring LPG](#)

[Circular economy statements LPG](#)

[Energy Planning Guidance](#)

[Whole life carbon LPG](#)

[Sustainable Transport, Walking and Cycling](#)

Local policy and guidance

Camden Local Plan (2017) (CLP)

[Policy G1 Delivery and location of growth](#)

[Policy C2 Community facilities](#)

[Policy C3 Cultural and leisure facilities](#)

[Policy C5 Safety and security](#)

[Policy C6 Access for all](#)

[Policy D1 Design](#)

[Policy D2 Heritage](#)

[Policy E1 Economic development](#)

[Policy E2 Employment premises and sites](#)

[Policy E3 Tourism](#)

[Policy A1 Managing the impact of development](#)

[Policy A4 Noise and vibration](#)

[Policy CC1 Climate change mitigation](#)

[Policy CC2 Adapting to climate change](#)

[Policy CC3 Water and flooding](#)

[Policy CC4 Air quality](#)

[Policy CC5 Waste](#)

[Policy TC2 Camden's centres and other shopping areas](#)

[Policy TC4 Town centre uses](#)

[Policy T1 Prioritising walking, cycling and public transport](#)

[Policy T2 Parking and car-free development](#)

[Policy T4 Sustainable movement of goods and materials](#)

[Policy DM1 Delivery and monitoring](#)

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

[Access for All CPG - March 2019](#)

[Air Quality - January 2021](#)

[Amenity - January 2021](#)

[Community uses, leisure and pubs - January 2021](#)

[Developer Contribution CPG - March 2019](#)

[Employment sites and business premises – January 2021](#)

[Energy efficiency and adaptation - January 2021](#)

[Town centres and retail - January 2021](#)

[Transport - January 2021](#)

[Water and flooding CPG - March 2019](#)

Other guidance:

Seven Dials (Covent Garden) [Conservation Area Statement](#) (1998)

Draft Camden Local Plan (DCLP)

The council published a new Draft Camden Local Plan (incorporating Site Allocations) for consultation in January 2024. Responses to the consultation and a [Submission Draft Camden Local Plan](#) (updated to take account of the

responses) was reported to Cabinet on 2 April 2025 and the Council on 7 April 2025. The Council resolved to agree the Submission Draft Local Plan for publication and submission to the government for examination following a further period of consultation.

The Council has published the Camden Local Plan Proposed Submission Draft for consultation. The consultation closed on Friday 27 June 2025.

The Submission Draft is a significant material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

6. ASSESSMENT

- 6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

7	Land use
8	Design & Heritage
9	Impact on neighbouring amenity
10	Energy & Sustainability
11	Air Quality
12	Biodiversity Net Gain
13	Transport
14	Refuse & Recycling
15	Community Infrastructure Levy (CIL)
16	Conclusion
17	Recommendations
18	Legal comments
19	Planning Conditions
20	Planning Informatives

7. LAND USE

Loss of employment floorspace (Class E)

- 7.1 Historically the building was predominantly in office use (B1) providing 2,200 sq. m of office floor space. As part of the 2017 and 2019 permissions 1,943 sq. m of office floorspace was approved within the 1st to 4th floors of the building. To ensure there was no overall loss of office floorspace from the flexible uses granted within the ground and mezzanine floors it was intended

that a proportion of either the ground floor or the ground floor mezzanine should be retained as office space so as to avoid any potential shortfall within the building as a whole. This equated to the need to maintain an area of 257 sq. m across the ground floor or ground floor mezzanine levels as office (out of a total area of 588 sq. m). A condition was attached to both permissions (Condition 18) to ensure that a minimum quantum of 2,200 sq. m (GIA) across all the floors of the building should be retained in office use.

- 7.2 The proposal would provide 3 areas of ancillary office floorspace measuring 89.5 sq. m at the ground floor mezzanine level. This would theoretically result in the loss of approximately 167.5 sq. m of office floorspace. The site is part of a recently completed development that provides approximately 2,000 sq. m of high-quality office accommodation across the upper floors. Despite one of the office floors being fully fitted out and furnished it has remained unlet for the last 12 months. The applicants have submitted a marketing note which identifies the challenging wider economic factors and significant supply of office space in the local market as reasons for lack of take-up of the office space. Due to the unusual attributes of the lower floors, including a lightwell that interconnects all the floors, the ground floor mezzanine is less suitable for occupation independently. The ground floor is more appropriate for a cultural or leisure use that activates the frontage and complements the character of the Covent Garden area and the immersive experience is similar in nature to a cultural / leisure use. The proposed immersive experience would also generate employment opportunities employing approximately 40 full time staff with approximately 15 stand-by staff and further indirect employment for security and cleaning staff being another 15 (seasonal dependent) which contributes to the wider creative and cultural economy, in line with Camden's ambitions to support a diverse and dynamic economy. On the basis that the substantial proportion of newly provided office floorspace is being retained on the site within the upper floors of the building which are most suitable to accommodate it, the overall employment function of the site is not considered to be undermined by the proposed loss of 167.5 sqm of office space on the ground floor mezzanine level. The partial loss of a modest area of office space within a larger building that includes mainly office floor space is justified, and the proposal remains compliant with the overall objectives of Policy E2.

Loss of community use (F1)

- 7.3 The 2017 and 2019 schemes identified the lower and upper basement areas approved uses as flexible restrictive D1 and D2 uses. Although the former D1 use class encompassed most forms of community use as well as other cultural and educational uses, the proposed loss of a hypothetical community use (now Class F1) at basement and ground floor level to become a commercial immersive experience is considered acceptable in principle and in accordance with Policy C2 of the Camden Local Plan. While Policy C2 aims to safeguard community facilities, it allows for the loss of such uses

where there is clear evidence that there is no demand, or where continued community use is not feasible. In this instance, although the site has not operated as an active community facility, it is understood that the premises have been marketed for community and other suitable uses for a period of approximately 12 months (from September 2024), with no confirmed interest or viable occupiers coming forward prior to the interest from the existing occupier who is now operating from the building. In the absence of realistic demand, the proposed use would make more effective use of the space. Located within the Central London Frontage and the Covent Garden Cultural Quarter, the immersive experience aligns with the strategic function of the area as a destination for arts, culture and visitor activity. The proposal would contribute to local footfall, economic vitality, and the diversification of leisure and cultural uses in line with the objectives of Policies C1 (Health and Wellbeing) and TC2 (Town Centres).

Proposed entertainment use (Sui Generis)

- 7.4 The proposed use would include an ancillary, themed merchandise area, bar area and admissions area at ground floor level, with the lower floors being used for the entertainment experience including a restaurant use. The upper mezzanine would be used as flexible offices, staff room and a flexible open space which is currently used as an overspill area for people to use after their entertainment experience has ended.
- 7.5 The proposals are strongly supported in land use terms, bringing cultural activities to the area and bringing the ground and basement floors of the recently completed but vacant building into use. An immersive experience use is appropriate in this highly-accessible location within the Central London Area, with a number of theatre and culture venues in the proximity. As such, the proposals are acceptable and in accordance with policies TC2 and TC4.
- 7.6 The 2017 and 2019 permissions granted a mix of uses across the lower basement to the upper mezzanine floors of the Shorts Gardens building. At lower basement level, permission was secured for a dedicated area to be used either as a restaurant (former Class A3, now Class E) or a drinking establishment (former Class A4, now sui generis), alongside the principal D1 (now Class E / F1) and D2 (now Class E / F2) uses. The A3/A4 element was restricted to 100 sq. m and confined to the lower basement floor following negotiations with the Council's Licensing Team.
- 7.7 As part of the current application, a bar area is proposed at ground floor level, with its floorspace limited to approximately 91.6 sq. m. It is important to note that the bar forms a small ancillary component of the wider immersive cultural use. To ensure that the bar area remains ancillary to the overall use a condition would be attached restricting the bar area to be not more than 100 sq. m (**Condition 3**)

- 7.8 The proposed upper basement floorplan identifies a possible restaurant component as part of the wider sui generis immersive experience use. While the Traitors Experience currently operating from the site does not include a restaurant use, this could change in the event of a new operator occupying the space or revised immersive offer. The upper basement measures 331 sq. m, and unrestricted use of this space for a restaurant could result in harmful amenity impacts on local residents from associated comings and goings.
- 7.9 Accordingly, it is considered necessary to impose a condition restricting any future food and drink use within this part of the building to not more than 100 sq. m (**Condition 2**).

8. DESIGN AND HERITAGE

- 8.1 The proposals involve only the change of use to the basement and ground floors of a recently refurbished building within Shorts Gardens. The development does not involve any external alterations or extensions. There are no proposed changes to the supporting structure of the building and all of the sets within it are capable of being removed. Should any external alterations be required in the future then these would be the subject of a separate application, as required. The entertainment use is consistent with and supplements the character of the Central London location.
- 8.2 As such, the development would not impact the character or appearance of the host building, the streetscene, or this part of the Seven Dials (Covent Garden) Conservation Area, and would be in accordance with policies D1 and D2 of the Camden Local Plan.
- 8.3 The Council has had special regard to the desirability of preserving the character and appearance of the Conservation Area, and the setting and special interest of adjacent listed buildings.

9. IMPACT ON NEIGHBOURING AMENITY

- 9.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. The thrust of the policies is that the quality of life of current and future occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.
- 9.2 The proposals do not include any external alterations or extensions and as such, would not increase opportunities for overlooking of neighbouring residential properties or impact their outlook, daylight or sunlight. The principal consideration is therefore the potential impact of noise and

disturbance arising from the use itself and from customers entering and leaving the premises.

- 9.3 The nearest residential properties and noise-sensitive receptors are located to the west of the site within Dudley Court. Given the location of the site mainly below ground floor, at a distance of over 45m from the residential properties, there would be limited noise disturbance arising from the use itself. The CGCA has suggested that the standard condition to restrict noise from the site should be extended to include a restriction on any amplified sound to cover activities such as sporting events. Although the applicant has confirmed that no music or sports broadcasts will be played at the premises this may change over time if / when the nature of the immersive experience changes. Consequently, it is considered reasonable to attach a condition requiring any amplified sound at the site to not be audible from adjoining neighbouring residential properties (**Condition 4**).
- 9.4 The proposed upper basement floor plan identifies food and drink use as part of the wider immersive experience use across the lower floors of the building (lower and upper basement, ground, and mezzanine ground floors). During the officer's site visit it was noted that a restaurant area has not yet been created within the upper basement. However, the operator could establish a restaurant in this space in the future. Given that any such restaurant would be located at upper basement level and would be limited in size (see paragraph 7.7 of the Land Use assessment section above), it is not considered that this would cause harm to the amenity of local residents.
- 9.5 Any additional plant required for a restaurant use could be accommodated within the existing extensive roof plant area. To protect amenity, a condition would be attached requiring any new internal plant to be mounted on anti-vibration isolators and adequately silenced to prevent additional noise or vibration (**Condition 6**). The 2017 and 2019 permissions also included a condition restricting the hours of operation of kitchen extract equipment, and it is considered reasonable to apply the same restriction to this permission (**Condition 7**).
- 9.6 The proposal includes a bar area at ground floor level measuring approximately 91.6 sq. m. The overall floorspace of the proposed use is around 1,300 sq. m, of which the bar accounts for less than 100 sq. m (under 8% of the total). The bar would not operate as a standalone venue, but as a supporting facility integral to the visitor experience, with access restricted to ticketholders attending the immersive event. The venue would be served by a single entrance fronting Shorts Gardens, which would be staffed by a security guard during opening hours. A condition would be attached to restrict the bar area to 100 sq. m to ensure that it does not increase in size as part of any future immersive experience (**Condition 2**). On this basis, the creation of a bar area as part of the wider immersive experience is not

considered to result in harm to the amenity of local residents and is therefore acceptable.

- 9.7 An Operational Management Plan (OMP) has been submitted with the application prepared by the building owner, Arclight, which provides further details of the proposed use and operation management details. It notes that the intention for alcohol to be served on the premises is for ticket holders only and no open alcohol will be allowed to leave the venue. The venue will also be accessible for corporate and private events. Guests are only able to pre-book tickets online ahead of time. The booking system closes 24 hours in advance, so tickets for the following day are no longer available to purchase after this time. Tickets will be scanned inside not outside the venue.
- 9.8 The OMP sets out proposed opening hours of 09:30–22:30 Sunday to Thursday and 09:30–23:30 on Fridays and Saturdays. The applicant has confirmed that the same opening hours previously secured under the 2017 and 2019 permissions are sought again, noting that staff will be present on site before opening and after closing to the public. The hours of operation included in the wording of condition 19 which was attached to the 2017 and 2019 permissions complements the dispersal plan. Accordingly, the opening hours of 08:00–22:30 (Monday to Thursday), 08:00–23:30 (Friday and Saturday), and 09:00–22:30 (Sunday and Bank Holidays) are considered acceptable for this central London location and shall be secured by condition (**Condition 5**).
- 9.9 The working capacity of the building is 264 people including employees. This is representative of the peak schedule. There will be 8 round tables with 14 people at each table (112 people). The round table experiences will be staggered in increments of 5 minutes and will last around 2 hours. There will be 6 two hour slots every day starting from 10:00 until 20:00. There will be a maximum of 2 performances in the building at any one time which will total up to 224 participants on site at any one time with 40 staff on site at any one time (excluding cleaning and security staff). Due to the staggered nature of the time slots it is expected that participants will filter into and out of the venue in groups of between 15-30 people. This would avoid people queuing outside the venue or leaving in large groups at the end of the participants experience.
- 9.10 The venue will be overseen by the venue management team consisting of 3-4 full time employees (Venue Manager, Deputy Venue Manager and Venue Technical Manager). The management team will have an onsite office. In addition, it is anticipated that approximately 40 staff will be on shift during operational hours comprising visitor service staff, bar staff and floor staff and approximately 15 cleaning and security staff.
- 9.11 It is anticipated that visitors will stay approximately 2 hours at the venue, and arrival and departure will be via the main entrance from Shorts Gardens. The

details of the dispersal plan are included in the OMP. Audience members will be directed to exit in the direction of Holborn station / Drury Lane especially into the evening.

9.12 Because of the location at basement and ground floor levels, the staggered entry and departure times, the entertainment style use with limited space to congregate post-event, the potential disturbance arising from customers entering and vacating the site is considered to be limited. Although the proposed bar area would serve alcohol, the predominant use of the site would be the entertainment function and the 91.6 sq. m bar area would be an ancillary element of this. As such, it is not considered to significantly alter the character of the approved scheme for the site as currently envisaged or unduly impact neighbouring amenity and the proposals are therefore considered to accord with policy A1 of the Local Plan.

9.13 The submitted Operation Management Plan is considered appropriate and would be secured via S106 as it will be a live document that will allow for review and modification as appropriate.

10. SUSTAINABILITY AND ENERGY

10.1 Non-residential changes of use of more than 500 sq. m of floorspace are expected to provide an energy statement setting out how a development has been designed to follow the steps in the energy hierarchy set out in the London Plan. Policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies wherever feasible. Applicants are also expected to submit a sustainability statement, the details of which are to be commensurate with the scale of the development, showing how the development will implement the sustainable design principles.

10.2 As part of the 2017 and 2019 permissions the approved scheme, as a 'major development' achieved an overall site wide CO2 emissions reduction of 48% over Part L Building Regulations baseline with a total reduction of 50.6% for the commercial elements. This was achieved through thermal insulation for the building elements, high efficiency communal gas fired boilers, heat recovery systems to all mechanical ventilation, low U-value glazing and LED internal lighting. As the building has just undergone a comprehensive refurbishment that was completed in June 2024 no additional energy requirements are required as part of this application.

10.3 Under the 2017 and 2019 permissions, the approved schemes achieved a BREEAM rating of 'Very Good', with the commercial elements meeting minimum credit scores in the energy (66.67%), water (75%), and materials (46%) categories. The BREEAM Post-Construction Review, secured through the legal agreement as one of the heads of terms, has since been

submitted and discharged. The development has already been constructed and the BREEAM obligations fully discharged.

- 10.4 The proposal would not include any external or internal changes to the building fabric and the existing overall functions within the building would not significantly change. As no alterations would be proposed that would affect the sustainability of the building a BREEAM assessment was not required to support this application. No physical changes are proposed to the building and the sustainability measures previously details in the BREEAM pre-assessment securing BREEAM 'Very Good' which accompanied the 2017 permission, continue to be in place. A BREEAM assessment would not be required if the specified floors of the building should be converted in the future.

11. AIR QUALITY

- 11.1 As the development involves a change of use to the existing lower floors of the building with no external alterations, any new internal ventilation works to the lower floors will connect to the existing ventilation system and air inlets. A condition was attached to the previous 2017 planning permission (Condition 11) requiring full details of the mechanical ventilation system including air inlet locations. The details were found to be acceptable (ref 2020/0295/P), with the existing air inlets located away from busy roads and boiler flues and as close to roof level as possible. The applicant has confirmed that there will be no change to the ventilation system as part of the proposal. Consequently, the proposed use is not expected to cause a negative impact on indoor air quality or external air pollution for surrounding areas. As such, it is not considered necessary to re-condition these details as what is in place is acceptable and no changes are proposed to them.

12. BIODIVERSITY NET GAIN

- 12.1 Biodiversity net gain (BNG) is an approach to development that requires new developments to result in a measurable increase in biodiversity compared to the pre-development baseline. However, there are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply.
- 12.2 In this case, the development does not trigger the requirement for BNG because it is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).

13. TRANSPORT

Trip generation

- 13.1 Normally, a Transport Assessment would be required for a major planning application relating to a change of use of over 1000 sq. m of floorspace. In this instance, the proposal would result in an estimated 1,424 two-way trips (712 arrivals and 712 departures), representing an uplift of 601 two-way trips compared with the 823 two-way trips associated with the range of consented uses (B1/A1/A3/A4/D1/D2). Importantly, the proposal does not involve any uplift in floorspace, with the total floorspace remaining at approximately 1,300 sq. m. The difference in trip generation arises solely from the nature of the proposed immersive visitor experience compared with the mix of approved uses.
- 13.2 The anticipated impact will be appropriately managed through the submission of a travel plan along with an associated monitoring and measures contribution of £11,348 and developer contribution towards active travel infrastructure (fee to be agreed) as well as the OMP. These would be secured by s106 legal agreement.

Cycle Parking

- 13.3 Local Plan Policy T1 requires developments to sufficiently provide for the needs of cyclists in accordance with London Plan standards. For sui generis uses, the guidance advises that the standard for the most similar use should be applied.
- 13.4 It is noted that 26 commercial cycle parking spaces for the B1/A3/A4/D1/D2 uses were secured at lower basement level within the Shorts Gardens building as part of the 2017 and 2019 permissions for the wider redevelopment of the buildings on Shorts Gardens and Betterton Street. The current proposal does not include any access to these existing spaces and they fall outside of the site location plan. The applicant has confirmed that most visitors will travel to the venue by public transport. Given that there is no increase in floorspace and the proposed immersive experience does not generate a direct demand for cycle parking, it is considered unnecessary to secure additional cycle parking provision. The 26 commercial cycle parking spaces approved as part of the larger scheme that included the B1/A3/A4/D1/D2 uses at lower levels shall be retained. Compliance with the previously approved details shall be secured by condition (**Condition 8**).

Car / coach parking

- 13.5 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.

- 13.6 The venue is expected to attract visitors from across London, the UK and overseas, the majority of whom will be visiting other attractions in the Camden Town area at the same time. As such, there is not expected to be any significant increase in passenger numbers on the local public transport network.
- 13.7 Nevertheless, given that the experience is likely to appeal to school groups (and other groups), the development shall be secured as coach party free by Section 106 Agreement. There are no coach parking facilities in the immediate area and it is important to prevent coaches from travelling to and from the site and parking in the nearby surrounding residential streets. Hence the need for this obligation.
- 13.8 In accordance with Policy T2 of the Camden Local Plan, the development shall also be secured as Business parking permit (car) free by means of the Section 106 Agreement. This will prevent the development from adding to existing on-street parking stress in the surrounding residential streets, whilst encouraging staff to travel by sustainable modes of transport such as walking, cycling and public transport.

Deliveries and servicing

- 13.9 Deliveries to and servicing of the site will take place in line with the landlords existing servicing management plan (SMP) that was approved as part of the 2017 and 2019 permissions. There is a loading bay on Short's Gardens in close proximity to the site which can be used for this purpose. Given that this is a change of use application, with no significant increase in servicing expected, it is considered that an SMP is not required for this development.
- 13.10 A condition (Condition 25) was attached to the 2017 and 2019 permissions to restrict the times for servicing the site to 08:00-20:00 Monday-Saturday, and 09:00-20:00 Sundays and bank holidays. This was to avoid obstruction of the surrounding streets and to ensure there was no harmful impact to amenity of adjacent premises.
- 13.11 The CGCA has raised concern about the approved times for deliveries and servicing at the site which were secured as part of the 2017 and 2019 permissions as it allows extended delivery and servicing times on Sundays and Bank Holidays.
- 13.12 The OMP advises that commercial deliveries, collections, and the storage/disposal of waste would generally be restricted to normal working hours of 08:00–18:00 from Monday to Sunday. On Sundays and Bank Holidays, servicing would commence one hour earlier than the previously approved hours but would generally finish two hours earlier, at 18:00 rather than 20:00 ensuring that evening disturbance is minimised. The OMP also recognises that, due to operational requirements of the proposed venue, occasional deliveries may be required during show change overs until 21:00.

To safeguard amenity, the applicant has confirmed that additional noise controls, such as vehicle engine shut-off and quiet unloading practices would be implemented at these times. These measures would be secured by condition (**Condition 9**). Overall, the proposed arrangements would provide greater flexibility to meet the operational needs of the venue without increasing the scale or intensity of servicing compared with the previously approved schemes, while maintaining robust safeguards to protect neighbouring amenity.

14. REFUSE & RECYCLING

- 14.1 Camden Local Plan policy CC5 (Waste) and Camden Planning Guidance (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 14.2 The proposed use as an immersive entertainment experience is likely to generate little waste and refuse. Any waste generated is likely to arise predominantly from the ancillary retail and refreshment areas which would be easily accommodated within the existing waste disposal arrangements.

15. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 15.1 The CIL applies to all proposals which add 100 sq. m of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule.
- 15.2 The proposal would not be liable for either the Mayor of London's CIL2 (MCIL2) or Camden's CIL as there is no net increase in floorspace or creation of residential units.

16. CONCLUSION

- 16.1 In conclusion, the proposed use is considered appropriate in this town centre location. It would be similar in its offering and impact to the most recently approved uses at the site, and would preserve and enhance the vitality, function and viability of Covent Garden. The development does not involve any external alterations and as such, would not cause harm to the character and appearance of the building, the wider streetscene or the Covent Garden conservation area. Subject to the suggested conditions and obligations including an Operation Management Plan and car and coach free development secured by legal agreement, the proposed development would be operated without resulting in harmful disturbance to residential neighbours. As such, the proposed development is considered acceptable and in accordance with policies TC2, TC4, D1, D2, A1, A4, T1 and T2.

17. RECOMMENDATION

17.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:

- Car free
- Coach free
- Operational Management Plan
- Pedestrian, cycling and environmental improvements (figure to be agreed)
- Travel plan an associated monitoring and measures contribution of £11,348

18. LEGAL COMMENTS

18.1 Members are referred to the note from the Legal Division at the start of the Agenda.

19. CONDITIONS

Standard conditions

1 Approved drawings

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Existing:

1087_PL-GA-LB; 1087_PL-GA-UB; 1087_PL-GA-00; 1087_PL-GA-0M.

Proposed:

P-IE-TTLE-25-005 rev D; P-IE-TTLE-25-004 rev D; P-IE-TTLE-25-002 rev D; P-IE-TTLE-25-006 rev C; P-IE-TTLE-25-003 rev E.

Documents:

Covering letter produced by Lichfields dated 24/06/2025 (ref 15019/01/BK/TJ/33868981v1); Operational Management Plan for The Traitors: Live Experience; Marketing Note prepared by Bluebook and RX London dated 14/08/2025.

Reason: For the avoidance of doubt and in the interest of proper planning.

2 Restricted restaurant uses

The use of the premises hereby approved shall not include more than 100 square metres of floorspace for the purposes of a restaurant (Class E(b)).

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies D1, A1, A4, TC1, TC2, and TC4 of the London Borough of Camden Local Plan 2017.

3 Restricted drinking establishment uses

The use of the premises hereby approved shall not include more than 100 square metres of floorspace for the purposes of a bar (Sui Generis Use).

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies D1, A1, A4, TC1, TC2, and TC4 of the London Borough of Camden Local Plan 2017.

4 Noise breakout

No music or amplified sound shall be played on the premises in such a way as to be audible within any adjoining residential premises or on the adjoining highway.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies D1, A1, A4, TC1, TC2, and TC4 of the London Borough of Camden Local Plan 2017.

5 Operating hours

The use hereby permitted shall not be carried out outside the following times: 08:00–22:30 (Monday to Thursday), 08:00–23:30 (Friday and Saturday), and 09:00–22:30 (Sunday and Bank Holidays).

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1, A4, TC1, TC2, TC4 of the London Borough of Camden Local Plan 2017.

6 Noise insulation

Prior to use of any restaurant area, plant equipment and any associated ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced. All such measures shall thereafter be retained and maintained in accordance with the manufacturers' recommendations.

Reason: To safeguard the amenities of adjoining premises and the area generally in accordance with the requirements of policy G1, A1, A4, D1 and CC1 of the London Borough of Camden Local Plan 2017

7 Kitchen extract equipment

Prior to the commencement of the use of any kitchen extract equipment, automatic time clocks shall be fitted to the equipment/machinery hereby approved, to ensure that the plant/equipment does not operate between 23:00hrs and 07:00 hrs. The timer equipment shall thereafter be permanently retained and maintained and retained in accordance with the manufacturer's recommendations.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, D1, A1, TC1, TC2 and A4 of the London Borough of Camden Local Plan 2017

8 Cycle parking

The 26 commercial cycle parking spaces in the lower basement shall be provided in accordance with the details approved under ref 2021/2374/P dated 12/10/2021 and shall be retained and maintained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.

9 Deliveries and Servicing

No deliveries, collections, or servicing shall take place outside the hours of 08:00–20:00 Monday to Saturday, and 08:00–18:00 on Sundays and Bank Holidays. Notwithstanding this, any occasional deliveries and servicing associated with show changeovers between the hours of 20:00 and 21:00 on any day, shall ensure that vehicle engines are switched off when stationary and no idling of vehicles shall take place during these operations.

Reason: To avoid obstruction of the surrounding streets and to safeguard amenities of adjacent premises in accordance with the requirements of policies A1 and T4 of the London Borough of Camden Local Plan 2017

20. INFORMATIVES

1	Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
2	Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
3	The applicant is encouraged to continue to explore further opportunities to reduce carbon emissions where practicable.
4	<p>Biodiversity Net Gain (BNG) Informative (1/3):</p> <p>The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless:</p> <p>(a) a Biodiversity Gain Plan has been submitted to the planning authority, and</p> <p>(b) the planning authority has approved the plan.</p> <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p> <p>There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.</p> <p>Based on the information provided, this will not require the approval of a BGP before development is begun because it is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat</p>

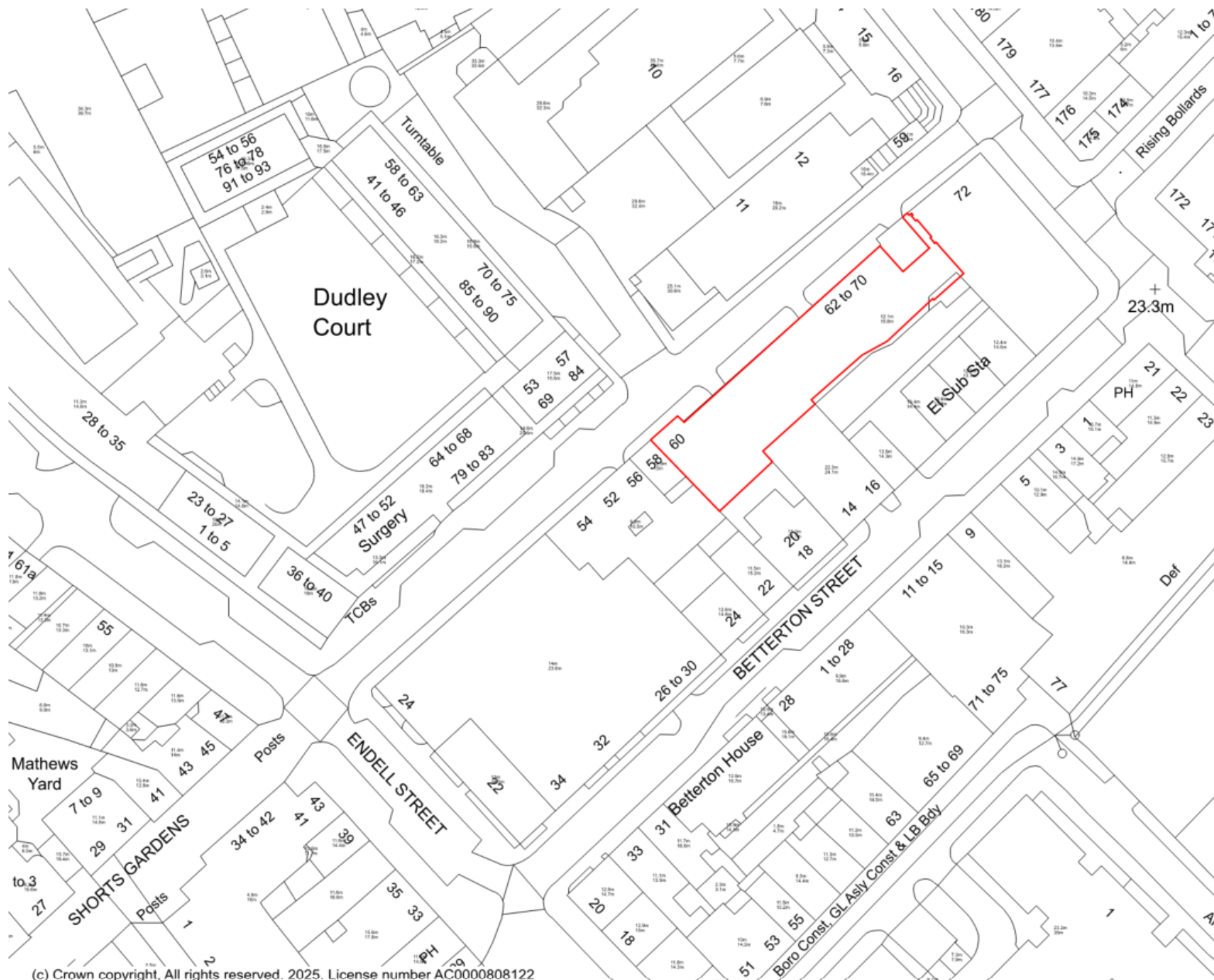
	with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat.
5	<p>Biodiversity Net Gain (BNG) Informative (2/3):</p> <p>+ Summary of transitional arrangements and exemptions for biodiversity gain condition</p> <p>The following are provided for information and may not apply to this permission:</p> <ol style="list-style-type: none"> 1. The planning application was made before 12 February 2024. 2. The planning permission is retrospective. 3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024. 4. The permission is exempt because of one or more of the reasons below: <ul style="list-style-type: none"> - It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024. - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat). - The application is a Householder Application. - It is for development of a "Biodiversity Gain Site". - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding). - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).
6	<p>Biodiversity Net Gain (BNG) Informative (3/3):</p> <p>+ Irreplaceable habitat:</p> <p>If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.</p>

+ The effect of section 73(2D) of the Town & Country Planning Act 1990

If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.

+ Phased development

In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.



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