

PLANNING APPLICATION FOR CHANGE OF USE FROM CLASS A3 (FOOD AND DRINK) TO CLASS D2 (ASSEMBLY & LEISURE)

PLANNING STATEMENT

UNIT 1B, THE VILLAGE, KING STREET, READING

ON BEHALF OF ESCAPE HUNT GROUP LTD

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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1. INTRODUCTION

- 1.1 This Statement has been produced on behalf of Escape Hunt Group Limited and supports a full planning application proposing a change of use of Unit 1B, The Village (formerly Kings Walk), King Street from Class A3 (food and drink) use to Class D2 (assembly & leisure) use. The site will be specifically used as a facility for 'escape-the-room' experiences.
- 1.2 The following sections of this Statement identify the relevant issues pertinent to the consideration of the application and include:
- A description of the application site and the surrounding area;
 - An overview of the relevant planning history;
 - A description of the application proposals;
 - An overview of the relevant planning policy; and
 - An assessment of the application proposals against the Development Plan, and relevant material considerations such as the NPPF.
- 1.3 In accordance with statutory and local information requirements, the following supporting material is submitted, and will enable a full assessment of the proposals to be undertaken:
- Location Plan;
 - 1st and 2nd Floor Layout (drawing number ASS 1999-02);
 - Proposed General Arrangement (drawing number 3950/01).
- 1.4 Overall this Statement will demonstrate that, on balance, this proposal represents a planning gain for the site and surrounding area. It is therefore respectfully requested that planning permission should be granted.

2. SITE DESCRIPTION AND CONTEXT

- 2.1 The application site ("Unit 1B") comprises the first and second floors of Unit 1 of The Village (formerly Kings Walk), situated on the south side of King Street within the town centre of Reading. The submitted Location Plan and drawing number ASS 1999-02 show the location of the site and the existing arrangement of the first and second floors, respectively.
- 2.2 Unit 1B is one of 17 units within The Village, a three-storey leisure scheme located in central Reading with entrances on King Street and Yield Hall Place. At present, 12 of the 17 units (over 70% of the units, representing 57% of the floorspace) are available to let.
- 2.3 Unit 1B has been vacant since January 2014. It has 4,046 square feet of floorspace and was last in use as a Greek restaurant. The ground floor of Unit 1 ("Unit 1A"), positioned below the application site, is occupied as a Pho Vietnamese restaurant. Other occupiers of The Village include the Dolce Vita Italian restaurant and the Caffeine and Cocktails cocktail bar.
- 2.4 The site neighbours 24 King Street to the east, which is occupied by Prospect Estate Agents (Class A2).
- 2.5 The site benefits from a central town centre location with a wide variety of services and facilities in the vicinity to serve both the residential population and visitors. The Village is highly accessible, being less than 400 metres from Reading railway station and with more than 20 local bus services serving the immediate vicinity.
- 2.6 Reading's prime retail area lies immediately west and south-west of King Street. Along Broad Street to the west are John Lewis, Marks and Spencer, Next, Primark and the Broad Street Mall with tenants including New Look, Wilko, TK Maxx, Foot Locker and food and drink outlets. To the south-west is the Oracle shopping centre, anchored by Debenhams and House of Fraser and featuring a Vue cinema and riverside restaurants on both sides of the River Kennett. The local area is well-served by restaurants and shops, but less so by entertainment and leisure uses.
- 2.7 The Village is also located within the Market Place/London Street Conservation Area, specifically within the Jackson's Corner Character Area. There are statutory

listed buildings in close proximity, including the Grade II listed 3-5 King Street (Barclays Bank) located opposite the site. The site also adjoins a building (24 King Street) identified within Reading Borough Council's *Market Place/London Street Conservation Area Appraisal* as being a '*Building of Townscape Merit*' in the context of the Conservation Area.

3. RELEVANT PLANNING HISTORY

3.1 Relevant planning history comprises of the following:

- Application Ref. 89/00157/FUL - Permission was granted in March 1989 for the construction of the Kings Walk development (since renamed The Village). The description of development was "*part two-storey, part three-storey development plus basement comprising 11 retail units in a pedestrian arcade and one two-bed flat. Formation of vehicular access off Yield Hall Place*".
- Application Ref. 970210 - The change of use of all of Unit 1 Kings Walk from Class A1 (retail) to Class A3 (food and drink) was approved in November 1997. The description of development was "*a change of use from Class A1 (retail) to Class A3 (premises for the sale of food and drink)*".
- Application Ref. 04/00410/FUL - In February 2005, permission was granted for the refurbishment of the whole Kings Walk complex. The description of development was "*refurbishment of existing shopping centre including the provision of two additional retail (A1) units, the extension of an existing restaurant (A3) and alterations to the north and south entrances*".
- Application Ref. 162147 - Permission was granted in March 2017 for the use of the whole of The Village complex to be changed from Class A1 to a flexible Class A1 / A3 use. This change reflected how the use of the complex had been implemented since its construction under 89/00157/FUL. The description of development was "*change of use of 1240 square metres of floor area of existing shopping centre from A1 (shop) to a flexible A1(shop)/A3(restaurant/cafe) use*".

4. PROPOSAL

Escape Hunt Group Operation

- 4.1 Escape Hunt Group Ltd is a global provider of live 'escape-the-room' experiences. The first Escape Hunt branch was opened in 2013 in Bangkok, Thailand. The business has grown quickly, becoming a franchised global network (including one owner-operated branch) of 45 branches across 28 countries. Escape Hunt now intends to focus on rolling out owner-operated branches, initially in the UK, whilst also continuing to franchise and sub-franchise.
- 4.2 An escape room is a physical adventure game in which players are typically locked in a themed room and have to find clues and solve puzzles in order to escape against a countdown clock. Escape Hunt's games typically require players to solve a crime story or mystery, which has been tailored to the location of the branch, within 60 minutes. The customer experience lasts 90 minutes including a 15 minute brief, 60 minute game and then a 15 minute de-brief.
- 4.3 For commercial reasons, branches are located in accessible locations within town/city centres, and are built to a high specification, with staff trained to a high service standard. In this instance, the application site provides a location that meets this commercial aim, with a suitably sized floorspace area and accessible location.
- 4.4 The games are clean, simple and enjoyed equally by all ages, with no gender bias. Escape Hunt is also ideal for corporate customers for team building and training activities. The operation of the branches is low impact in terms of both waste and noise. Almost no waste is generated by the escape room use, and since the games are immersive and require the concentration of participants in solving puzzles there is very little noise.
- 4.5 Since 2014, Escape Hunt has achieved high customer advocacy via TripAdvisor, with Escape Hunt's branches scoring on average 4.6 (out of 5) from over 6,500 reviews and rank in the top quartile of the "Fun and Games" or "Things to Do" categories for their respective locations.
- 4.6 Escape Hunt branches are additive and complimentary to their surroundings. They bring customers to their location for a unique experience, many of whom

then use surrounding retail, food & drink and leisure facilities in the area. The specific use therefore enhances the vitality and viability of a shopping area.

Specific Proposal

- 4.7 The proposal comprises a change of use of Unit 1B, located on the first and second floors of The Village, from Class A3 (food and drink) to Class D2 (assembly and leisure) for use as an 'escape-the-room' experience facility.
- 4.8 Submitted drawing number 3950-01 shows the proposed general layout of the facility.
- 4.9 The detailed proposal includes six 'escape rooms' (three on the first floor and three on the second floor) with associated first-floor reception, two lounge areas, two 'game master rooms' (from which the escape-the-room experiences will be supervised and controlled) toilet facilities, kitchenettes, service cupboards and storage space.
- 4.10 Unit 1B will be accessed via the first-floor reception shown on drawing number 3950-01, utilising an existing entrance. Existing second-floor exits will be retained as fire exits. A new lift and a new staircase will provide routes between the floors.
- 4.11 The proposed opening hours are 10am – 10pm Monday to Sunday, contributing to the local day-time and evening economies.
- 4.12 The proposed reuse of Unit 1B would utilise a space that has been vacant and unused for nearly four years since the previous tenant ceased occupation in January 2014. The overall proposal would represent a viable and efficient use of the site.
- 4.13 No external alterations are proposed as part of this application and the proposed internal alterations do not constitute development under Section 55(2) of the Town and Country Planning Act 1990 (as amended). Planning permission is, therefore, only required for the change of use of the unit from Class A3 to Class D2 use.
- 4.14 The proposal would have no effect on the operation of existing neighbouring uses.

5. RELEVANT PLANNING POLICY

- 5.1 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act, applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

DEVELOPMENT PLAN

- 5.2 The Development Plan for the area consists of the Reading Borough Core Strategy ("RBCS") (adopted in 2008 and amended in 2015), the Reading Central Area Action Plan ("RCAAP") (adopted in 2009) and the Reading Sites and Detailed Policies Document ("SDPD") (adopted in 2012).
- 5.3 In the context of the Development Plan, the application site is located within the designated 'Reading Centre', 'Central Core' and 'Primary Shopping Area', as defined by the RCAAP.

Reading Borough Core Strategy ("RBCS")

- 5.4 The RBCS generally seeks to increase the range of leisure and cultural facilities in the Borough of Reading and provide "*a wide variety of retail, leisure and culture uses*" within the centre of Reading (paragraph 8.4).
- 5.5 **Policy CS25** seeks to direct major retail and main town centre uses and cultural development to the centre of Reading.
- 5.6 **Policy CS26** identifies a network of centres, with Reading Town Centre identified as the Regional Centre, and aims to maintain and enhance the vitality and viability of the centres and widen their range of uses.
- 5.7 **Policy CS27** is aimed at maintaining "*a strong retail character*" in the designated centres, by prohibiting "*significant groupings of non-retail in one part of a centre*". The policy identifies a monitoring target for District and Local Centres of 50% of A1, A2, A3, A4, A5 and *sui generis* use units within these centres to be in A1 use. This monitoring target/threshold does not apply to the Regional Centre (Reading Town Centre) and an appeal decision (APP/E0345/A/14/2228320) has affirmed this position.
- 5.8 **Policy CS33** requires the protection and enhancement of the historic environment, including conservation areas and listed buildings. The site is located

within the Market Place / London Street Conservation Area. There are several statutorily listed buildings in the vicinity of the application site.

Reading Central Area Action Plan ("RCAAP")

- 5.9 **Policy RC5** of the RCAAP sets requirements for the design of proposed development within the Reading central area, including layout, public realm requirements, place-making, architectural details and materials and contributions to the diversity, adaptability and safety.
- 5.10 **Policy RC6** of the RCAAP states that retail development will take place in the 'Primary Shopping Area', with other main town centre uses (such as the application proposal) to be located within the 'Central Core'. The application site is located within both the 'Primary Shopping Area' and the 'Central Core'.
- 5.11 **Policy RC7** of the RCAAP seeks to locate leisure, culture and tourism development in the centre of Reading.

Reading Sites and Detailed Policies Document ("SDPD")

- 5.12 **Policy DM4** relates to safeguarding amenity. The policy states that development will not cause a significant detrimental impact to the living environment of existing or new residential properties, in terms of:
- Privacy and overlooking;
 - Access to sunlight and daylight;
 - Visual dominance and overbearing effects of a development;
 - Noise and disturbance;
 - Artificial lighting;
 - Vibration;
 - Dust and fumes;
 - Smell; or
 - Crime and safety

OTHER MATERIAL CONSIDERATIONS

Draft Reading Borough Local Plan ("DRBLP")

- 5.13 The Council consulted on the DRBLP in May and June 2017. In many respects, the policies outlined above that relate to the application site are replicated in the DRBLP.
- 5.14 **Draft Policy RL1** again designates Reading centre the Regional Centre and requires the vitality and viability of centres to be maintained and enhanced, including through broadening the range of facilities.
- 5.15 **Draft Policy RL2** seeks the provision of up to 44,600 square metres of "*retail and related facilities ... together with new leisure facilities*" by 2036.
- 5.16 **Draft Policy CR1** again directs retail development to the Primary Shopping Area and main town uses other than retail and office development to the Central Core.
- 5.17 **Draft Policy CR4** says "*leisure, cultural and tourism uses that would attract a wide range of people into [Reading] centre will be encouraged*" in the Central Core (which includes the application site).

National Planning Policy

- 5.18 The applicant has given consideration to national policy contained in the National Planning Policy Framework, as well as National Planning Practice Guidance.

National Planning Policy Framework ("NPPF")

- 5.19 The NPPF identifies that the purpose of the planning system is to contribute to the achievement of sustainable development, with regards to three dimensions, comprising of economic, social and environmental roles.
- 5.20 A core principle of the NPPF states that "*every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth*".
- 5.21 **Paragraph 14** sets out the presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. This means approving proposals that accord with the

development plan without delay and where the development plan is absent, silent or out-of-date, grant planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF.

- 5.22 The NPPF very clearly underlines the Government's commitment to ensuring that the planning system does everything it can to support sustainable economic growth. **Paragraph 19** states that *"significant weight should be placed on the need to support economic growth through the planning system"*.
- 5.23 **Paragraph 23** states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. Local planning authorities should, amongst other things, support the viability and vitality of town centres, as well as promote competitive town centres that provide customer choice and reflect the individuality of town centres.
- 5.24 In determining planning applications, **Paragraph 196** states that the NPPF is a material consideration. **Paragraph 197** reiterates that in assessing and determining proposals *"local planning authorities should apply the presumption in favour of sustainable development"*.

National Planning Practice Guidance ("NPPG")

- 5.25 The NPPG states that local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work. Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach, and taking account of specific town centre policy. In doing so, local planning authorities should be mindful of the different rates of development in town centres compared with out of centre.

6. ASSESSMENT OF PROPOSAL

Principle of development

- 6.1 The principle of a change of use of Unit 1B from Class A3 (food and drink) to Class D2 (assembly and leisure) for use as an 'escape-the-room' experience facility is supported by the Development Plan, as well as by emerging local planning policy and by national planning policy.
- 6.2 Paragraph 23 of the NPPF requires planning policies to be positive and to promote competitive town centre environments. Policies CS25, CS26 and CS27 of the RBCS, and policies RC6 and RC7 of the RCAAP, seek to maintain and enhance Reading's centres by both maintaining the existing strong retail character and broadening their offer in terms of other town centre uses, including entertainment, leisure and tourist attractions.
- 6.3 In the context of the Development Plan, the application site is located within the 'Regional Centre' (Reading town centre), the 'Central Core' and the 'Primary Shopping Area'.
- 6.4 As both a 'Primary Shopping Area' and a 'Central Core' site, it is considered that the use of the application site for either retail or other "*main town centre uses*", including as an 'escape-the-room' leisure facility (Class D2), is supported by the wording of RCAAP policy RC6. Furthermore, RCAAP policy RC7 provides active support for locating new leisure, culture and tourism development, such as the proposed 'escape-the-room' facility, in the centre of Reading. The proposed leisure use would therefore clearly accord with the RCAAP.
- 6.5 Whilst RBCS policy CS27 seeks to prohibit "*significant groupings of non-retail in one part of a centre*", the site is already in non-retail use and the change of a Class A3 (food and drink) unit to Class D2 (assembly and leisure) use would have no impact on the existing proportion of Reading town centre that is not in use Class A1 (shops) use.
- 6.6 It is also notable that the Council advised in the committee report relating to application ref. 162147 in March 2017, that the potential use of the *whole* of The Village (therefore including the application site) for Class A3 (food and drink) use would not result in a significant grouping of non-retail uses for the purposes of RBCS policy CS27, when viewed in the context of the Regional Centre. Within the committee report, the Council notably stated that "*in the history of the Kings*

Walk Shopping Centre the occupancy of the units has never matched the success of other similar developments in Reading such as The Oracle or Broad Street Mall. It is considered that confirmation of potential A3 use for all units within the centre (apart from the existing A4 unit to the rear) would not harm the strong retail character of Reading Town Centre as a whole or Kings Walk and the immediate surrounding area, taking into account the current and historic high vacancy rate of units within the complex". It is considered that these views are also applicable in this instance and, as noted in Section 2 of this Statement, it is notable that the application site is one of twelve units within a total of seventeen units located within The Village that are available to let. This represents over 70% of the units, and 57% of the floorspace in The Village.

- 6.7 The proposed change of use would make a positive contribution to the vitality and viability of Reading town centre, providing an entertainment visitor attraction that will increase footfall into this area and correspondingly complement the character and function of the wider 'Primary Shopping Area' and 'Central Core'. The proposal would represent an effective, appropriate and sustainable reuse of a unit that has been vacant for some time (since January 2014), within a development complex with a history of vacancies (acknowledged in the committee report mentioned above) and with a large proportion of units currently available to let.
- 6.8 Escape Hunt proposals such as this are additive and complementary to their surroundings, and do not generate the types of amenity issues from noise generation, litter or odour that other entertainment uses can produce. The proposal will bring customers to the location for a leisure experience, widening the range of uses in the locality, and with many customers then using surrounding retail, food & drink and other leisure facilities in the area.
- 6.9 The proposal would therefore clearly accord with the RBCS, maintaining the strong retail character sought under policy CS27, and enhancing the vitality and viability of the centre and widening the range of available uses in line with policy CS26. In this regard, the proposal would also clearly accord with draft policies RL1, RL2, CR1 and CR4 of DRBLP.
- 6.10 It is envisaged that the proposed development will create four full-time and four part-time operational jobs, providing economic benefits to the local community. By attracting additional visitors to this area of Reading town centre, the proposed

leisure use will complement the retail function of the wider area, broadening the town centre uses without threatening the strong retail nature of its surroundings.

- 6.11 The NPPF and National Planning Practice Guidance places significant weight on the need to support economic growth, and this application would certainly help to achieve this. The proposal would create both jobs and economic prosperity for the area, supporting sustainable economic growth. These benefits are therefore a material consideration in the determination of the planning application and the Council should respond positively to this opportunity for growth, in line with the provisions set out in the NPPF. The proposed development would clearly represent the achievement of sustainable development as set out under the NPPF, which is therefore a significant material consideration in favour of the application.

Highways & Access

- 6.12 The proposed change of use will have a negligible impact in terms of transport, with consideration to the existing situation and location of the site.
- 6.13 The site is located in a highly sustainable location, accessible by sustainable modes of transport; less than 400 metres from Reading train station for local and national rail services, and well-served by bus links. As a result of the accessible and sustainable town centre location, it is not considered necessary to provide any new private car parking spaces as part of this proposal.
- 6.14 The site will be accessed via the first-floor reception shown on submitted drawing number 3950-01, utilising existing access arrangements within The Village complex. Existing second-floor exits will be retained as fire exits. A new lift and a new staircase will provide routes between the floors, improving access at the site, including provision for disabled access.

Amenity

- 6.15 The proposal involves immersive games that require the concentration of participants in solving puzzles, resulting in very little noise generation. When compared with the previous restaurant use of the site the proposal would generate less noise impact. Furthermore, the application site does not immediately adjoin any residential properties. Commercial / non-residential uses

adjoin the site within The Village and at the neighbouring property, 24 King Street.

- 6.16 The proposed opening hours of 10am to 10pm, Monday to Sunday, would not cause late-night activity and would be appropriate in this town location. It is therefore considered that the proposal would not cause an adverse effect on residential amenity or local environmental quality as a result of noise and late-night activity.
- 6.17 The proposal would not generate any odours, and waste generation would be very low, with the 'escape room' operation generating almost no waste. The proposal would also not cause any vibration from plant equipment or machinery as such equipment would not be required as part of the proposed use. It is therefore considered that the proposal would also not cause an adverse effect on residential amenity or local environmental quality as a result of vibration or smells.
- 6.18 The proposed change of use will not result in any discernible adverse harm to the amenity of the area, including residential properties located in the wider area, and would clearly accord with policy DM4 of the SDPD.

Design

- 6.19 Submitted drawing number 3950-01 shows the general layout of the proposal. The detailed proposal includes six 'escape rooms' (three on the first floor and three on the second floor) with associated first-floor reception, two lounge areas, two 'game master rooms' (from which the escape-the-room experiences will be supervised and controlled) toilet facilities, kitchenettes, service cupboards and storage space.
- 6.20 The proposal seeks the change of use of the application site only, and does not include any external alterations to the building. The proposed internal alterations do not constitute development as defined under Section 55(2) of the Town and Country Planning Act 1990 (as amended). Planning permission is therefore only required for the change of use of the unit from Class A3 to Class D2 use. There will therefore be no conflict with the requirements for central Reading development stipulated by RCAAP policy RC5. Given that there will be no impact on the external appearance of the building, the surrounding Conservation Area or the setting of the nearby listed buildings, the proposal does not conflict with

RBCS policy CS33 or the provisions of the NPPF in relation to the protection and enhancement of the historic environment.

- 6.21 The proposal would be designed to a high-quality standard, that would successfully integrate with the surrounding area, protect amenity and improve accessibility at the site, and would therefore accord with the Development Plan, as well as with the provisions of the NPPF and NPPG.

7. CONCLUSION

- 7.1 The proposal is for the change of use of Unit 1B, The Village, King Street from Use Class A3 (food and drink) to Use Class D2 (assembly & leisure), to accommodate an Escape Hunt 'escape-the-room' operation. In the context of the Development Plan, the site is located within the 'Central Core' and represents an appropriate and sustainable location for such a proposal.
- 7.2 The site has been vacant for some time (since January 2014) and this proposal offers an opportunity to improve the vitality and viability of Reading town centre by bringing a unit, located in a scheme with a history of vacancies, back into a viable town centre use, with a specific leisure use that would help attract footfall into this area.
- 7.3 The principle of the proposed change of use is supported by relevant Development Plan policies, including RBCS policies CS25, CS26 and CS27 and policies RC6 and RC7 of the RCCAP, as well as with the provisions of the NPPF, NPPG and emerging planning policy contained within the DRBLP.
- 7.4 The proposal would provide clear benefits for the local area, including the creation of jobs and economic prosperity, and would represent sustainable economic growth for the area, which should be a material consideration in the determination of this application. The proposal would improve the vitality of both the daytime and evening economy, and promote a diverse and complementary mix of uses for the local shopping area.
- 7.5 The proposed use will not generate any odours, there will be no new plant to generate vibrations and noise and waste generation will be very low causing a negligible impact on surrounding amenity, particularly in the context of the location and previous lawful Class A3 use of the site. The proposal would be designed to a high-quality standard, that would successfully integrate with the surrounding area, protect amenity and improve accessibility at the site, and would therefore accord with the Development Plan, as well as with the provisions of the NPPF and NPPG, with regard to design, amenity and transport considerations.
- 7.6 Overall this Statement has demonstrated that the proposed development is compliant with the provisions of both national and Development Plan policy. It is considered that there are no reasons why planning permission should be

withheld, and therefore it is respectfully requested that planning permission is granted.