

Punch Partnerships (PML) Limited
Calthorpe Arms,
252 Gray's Inn Road,
London, WC1X 8JR



Planning Statement

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Document Control

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Project: Calthorpe Arms, Bloomsbury.

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1.0 Introduction

Proposal

1.1 CPC Planning Consultants Ltd (“**CPC**” or the “**Agent**”) have produced this Planning Statement on behalf of Punch Partnerships (PML) Limited (“**Punch**” or the “**Applicant**”), in support of its planning applications at the proposal site: The Calthorpe Arms, 252 Gray's Inn Road, London, WC1X 8JR (the “**Site**”).

1.2 The “**Application**” seeks full planning permission and Listed Building Consent from the London Borough of Camden (the “**Council**” or the “**LPA**”) for the following development:

“The retention and reconfiguration of the existing public house and retention of a public house manager’s flat (Sui Generis) at the third storey; works to convert the first and second storeys of the public house to provide two residential apartments (Use Class C3), including a two-storey infill extension, internal and external alterations; the erection of a lockable bike shed on Wren Street; and the relocation / replacement of the existing kitchen extract system.”

1.3 The schedule of accommodation is as follow:

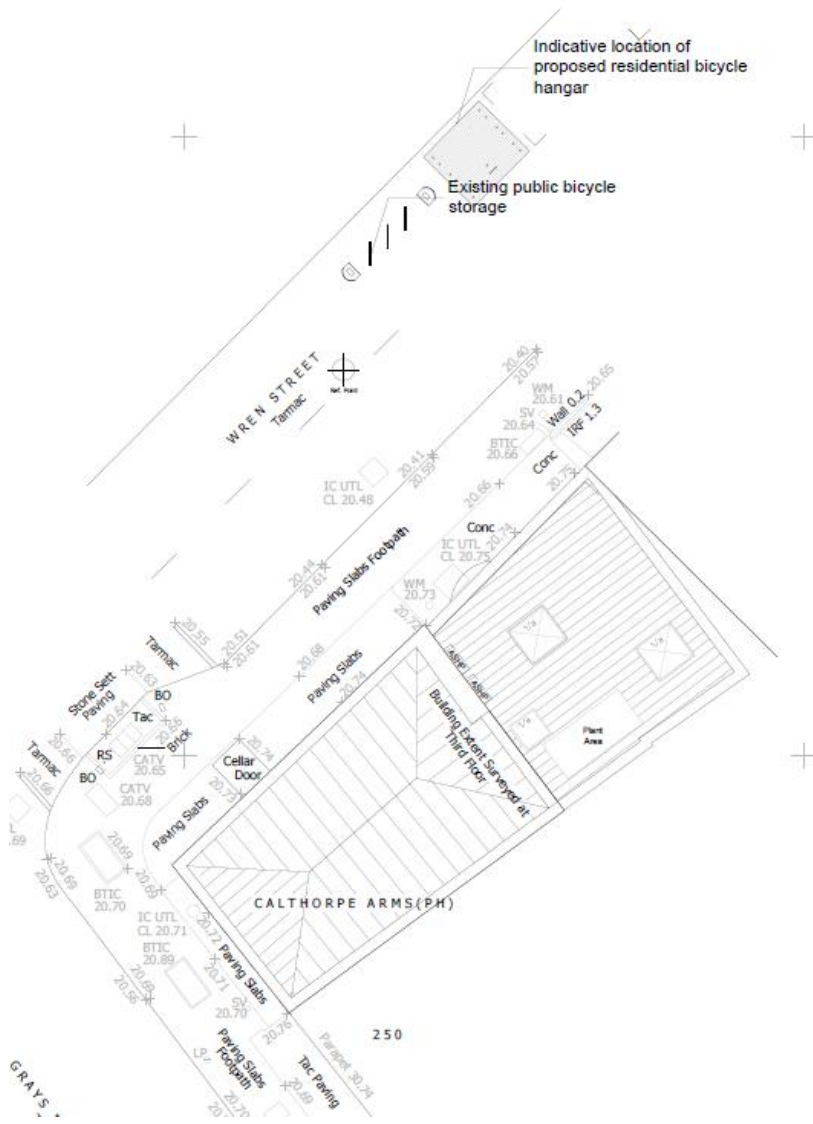
Apartment	Accommodation	Gross Internal Area (sqm)
1 (Studio)	1 bedroom, 2 person	39
2	1 bedroom, 2 person	52
3 (Manager’s flat)	1 bedroom, 2 person	59

1.4 The application comprises the following documentation:

- Completed Application Form
- Community Infrastructure Levy (“CIL”) Form
- Covering Letter – prepared by CPC Planning Consultants
- Existing and Proposed Plans – prepared by PLC
- Computer Generate Image – prepared by PM Creative
- Design and Access Statement – prepared by PLC
- Heritage Statement – prepared by Heritage Information
- Noise Impact Assessment – prepared by Airtight Noisecheck
- Energy/Sustainability Statement – prepared by SRE
- Fire Statement – prepared by PLC

1.5 The proposed site plan, elevation plans and computer generated image are given below for illustrative purposes only.

Proposed site plan



Proposed elevations



Proposed North West Elevation



Proposed South West

Computer generated image



2.0 Application Site and Surroundings

- 2.1 The application site is in a highly sustainable location in Bloomsbury, Camden within the Central London Area.
- 2.2 The Calthorpe Arms public house is situated on the corner plot on Gray's Inn Road and Wren Street.
- 2.3 The pub was listed as an Asset of Community Value in December 2021.
- 2.4 The primary pub bar area is situated on the ground floor, while the function room and kitchen are on the first floor, and the manager's flat is located on the second and third floors.
- 2.5 The locality along Gray's Inn Road is predominantly two and three-storey mixed-used terraced properties, with commercial uses occupying the ground floors and residential uses on upper floors. There are other public facilities available, including a community centre, public open spaces and colleges.
- 2.6 The Calthorpe Arms public house is a Grade II Listed building sitting within the Bloomsbury Conservation Area, surrounded by several other Grade II Listed buildings, including the terrace at 244-250 (even), Gray's Inn Road, and the terrace at 2-9 Wren Street.
- 2.7 Being situated within Central London and served by a number of tube stations and bus stops in the locality, the site location has a high PTAL rating of 6a, reflecting how highly accessible the site is by public transport.
- 2.8 According to the Environment Agency's flood maps for planning, the entirety of the site is located within Flood Zone 1 with very low flood risk of flooding from surface water sources.

3.0 Planning History

3.1 The following applications relate to proposals at the application site:

1. 2021/62333/PRE - Retention of public house, change of use of ancillary public house uses, reconfiguration of internal layout (all floors), and erection of side extension at first, second and third floors to provide 1 x studio unit and 3 x 1 bed units and associated cycle parking – The Council provided a written response on 22nd March 2022, recommending modifications in design, materials, form and scale because of potential harm to heritage assets.
2. 2015/3575/P - Reduction in height to an existing unlawful timber refuse enclosure located on the forecourt of the Wren Street elevation. The structure is to be used in connection with the public house (Class A4) – Granted with planning permission on 19th November 2015
3. 2015/3678/L – Listed Building Consent – Reduction in height to an existing unlawful timber refuse enclosure located on the forecourt of the Wren Street elevation. The structure is to be used in connection with the public house (Class A4) – Granted with planning permission on 19th November 2015
4. 2015/2938/L – Listed Building Consent – Removal of existing air-conditioning condenser, shelter and extract flue and installation of 2 inlet/extract flues at first floor roof terrace – Granted with planning permission on 16th July 2015
5. 2015/2884/P – Replacement of existing extract units with 2 inlet/extract flues at first floor roof terrace to public house (Class A4) – Granted with planning permission on 16th July 2015

3.2 The following applications relate to proposals on surrounding sites:

1. 2008/2137/L– Internal and external alterations associated with the change of use of ground and basement floors from retail use (Class A1) to residential use (Class C3) to be used in connection with the existing maisonette on the upper floors as a single family dwellinghouse. Alterations to front of building including creation of new front lightwell with railings and new basement windows. – Granted with planning permission on 07th May 2008

4.0 Planning Policy Context

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that, in the determination of planning applications, decisions are made in accordance with the Statutory Development Plan of the District, unless material considerations indicate otherwise.
- 4.2 The Site is within the jurisdiction of Royal Borough of Camden, where the development plan comprises the Camden Local Plan (adopted 2017).
- 4.3 Camden Council is a London Borough, so the Local Plan should be read together with the London Plan (2021).
- 4.4 Given the application site falls within the Bloomsbury Conservation Area, the Conservation Area Appraisal and Management Strategy, published in 2011, has been considered.
- 4.5 Given the nature of the application, the following Supplementary Planning Documents (“SPD”) and other relevant planning policy guidance have been considered:
1. Access CPG (2019);
 2. Amenity CPG (2021);
 3. Design CPG (2021);
 4. Housing CPG (2021);
 5. Energy Efficiency and Adaptation CPG (2021);
 6. Transport CPG (2021)
 7. Urban Design Guide (2019)
 8. London Plan Housing SPD (2016)

National Planning Policy Framework

- 4.6 The revised National Planning Policy Framework (“the **NPPF**”) was published in July 2021 and establishes overarching principles of the planning system which aim to contribute to the achievement of sustainable development.
- **Paragraph 2** states that: *“Planning applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise.”*
 - **Paragraph 8** confirms that the planning system should have three overarching, mutual objectives in relation to economic, social and environmental aspects for achieving sustainable development.

- **Paragraph 11** expects plans and decisions to apply a presumption in favour of sustainable development. Development proposals should accord with an up-to date development plan, which would promote sustainable development while being flexible to mitigate climate change and adapt to its effect.
- **Paragraph 38** states Local Planning Authorities should approach decisions on proposed development in a positive and creative way, through utilising any planning tools and working proactively with applicants.
- **Paragraph 47** requires applications for planning permission to be determined according to the development plan unless material considerations indicate otherwise. Decisions should also be made as quickly as possible and within statutory timescales.
- **Paragraph 55** states that planning authorities should consider whether unacceptable impacts of a development can be made acceptable via planning conditions.
- **Section 5** on delivering housing sets out the Government’s commitment to boosting the supply of homes to meet local needs, and addressing those with specific housing requirements, and that land with permission should be developed without necessary delay.
- **Paragraph 69** states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.
- **Paragraph 86** states that planning policies and guidance should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Paragraph 86(f) particularly focuses on the importance of residential development in ensuring the vitality of town centres and should encourage residential development on appropriate sites.
- **Paragraph 120** states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes; promote and support the development of under-utilised land and buildings to meet identified needs for housing.
- **Paragraph 123** expects local planning authorities to take a positive approach to applications for alternative uses of land which is currently developed but not allocated for alternative purpose in plans, where this would help to meet identified development needs.
- **Paragraph 126** states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of

sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

- **Paragraph 154** requires new development to be planned in ways that avoid increased vulnerability to the impacts arising from climate change and to reduce greenhouse gas emissions.
- **Paragraph 159** indicates inappropriate development in areas at risk of flood should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- **Paragraph 189** describes heritage asset as irreplaceable resource and should be conserved in a manner appropriate to their significance, so they can be enjoyed for their contribution to the quality of life of existing and future generations.
- **Paragraph 200** expects clear and convincing justification for any harm to, or loss of, the significance of a designated heritage asset from its alteration or destruction or from development within its setting. Substantial harm to grade II listed buildings should be exceptional.
- **Paragraph 202** states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

The London Plan (2021)

4.7 The London Plan was adopted in 2021. The Plan sets out a framework for how London will develop over the next 20-25 years and meet the Mayor’s vision for ‘Good Growth’. The policies as relevant to the Application are given consideration below:

4.8 The following policies are the most relevant to the application:

- **Policy GG2 Making the best use of land**
- **Policy GG4 Delivering the homes Londoners need**
- **Policy GG6 Increasing efficiency and resilience**
- **Policy D3 Optimising site capacity through the design-led approach**
- **Policy D4 Delivering good design**
- **Policy D5 Inclusive design**

- **Policy D6 Housing quality and standards**
- **Policy D7 Accessible Housing**
- **Policy D13 Agent of Change**
- **Policy D14 Noise**
- **Policy H1 Increasing housing supply**
- **Policy H2 Small sites**
- **Policy H10 Housing size mix**
- **Policy HC1 Heritage conservation and growth**
- **Policy HC7 Protecting public houses**
- **Policy SI 1 Improving air quality**
- **Policy SI 2 Minimising greenhouse gas emissions**
- **Policy SI 5 Water Infrastructure**
- **Policy SI 7 Reducing waste and supporting the circular economy**
- **Policy SI 4 Managing heat risk**
- **Policy SI 5 Water infrastructure**
- **Policy SI 12 Flood risk management**
- **Policy SI 13 Sustainable drainage**
- **Policy T4 Assessing and mitigating transport impacts**
- **Policy T5 Cycling**
- **Policy T6 Car parking**
- **Policy T6.1 Residential parking**

Camden Local Plan

4.9 The Local Plan was adopted in 2017. The plan sets out the Council’s spatial vision of the development of the Borough, identify the relevant strategic objections and implementation of strategies. The policies as relevant to the Application are given consideration below:

- **Policy H1: Maximising housing supply**
- **Policy H4: Maximising the supply of affordable housing**
- **Policy H6: Housing choice and mix**
- **Policy H7: Large and small homes**

- **Policy A1: Managing the impact of development**
- **Policy A4: Noise and vibration**
- **Policy D1: Design**
- **Policy D2: Heritage**
- **Policy C1: Health & Well-being**
- **Policy C4: Public Houses**
- **Policy C5: Safety and Security**
- **Policy C6: Access for all**
- **Policy CC1: Climate change mitigation**
- **Policy CC2: Adapting to climate change**
- **Policy CC5: Waste**
- **Policy T1: Prioritising walking, cycling and public transport**
- **Policy T2: Parking and car-free development**
- **Policy T3: Transport Infrastructure**
- **Policy T4: Sustainable movement of goods and materials**

Bloomsbury Conservation Area Appraisal and Management Strategy

- 4.10 This Conservation Area Appraisal was adopted in 2011, providing guidance regarding the Council's approach to preserve and enhancement the Conservation Area. A summary of the special interest and character and appearance of the Conservation Area has been provided.
- 4.11 The Calthorpe Arms is located in Sub Area 14: Calthorpe Street/Frederick Street, which is on the eastern boundary of the Bloomsbury Conservation Area, comprising mainly terraced housing built on the Swinton and Calthorpe Estates to the east of Gray's Inn Road.
- 4.12 While the pub is not mentioned in the description of Wren Street in the Appraisal, it is categorised as having a 'Shopfront of merit' in the Built Heritage Audit of Sub Area 14; while St. Andrew's Gardens, located east of Gray's Inn Road, opposite the Calthorpe Arms, is described as the only formal open space in the Sub Area.
- 4.13 The Audit has also considered the views to largely unaltered rears of listed terraces, which is relevant to the surrounding of the site, where Grade II listed terraces can be found on No.2-9 Wren Street, No. 240-252 Gray's Inn Road and no. 1-21 Calthorpe Street.

Community Infrastructure Levy (CIL)

- 4.14 London Borough of Camden adopted a new Community Infrastructure Levy (“CIL”) Charging Schedule in October 2020, assigning financial contributions to different types of planning applications. In 2020, the financial contribution for residential dwellings (C3) was £648 per sqm; as of 2023, the financial contribution is £684 per sqm.
- 4.15 The Mayoral CIL (MCIL2) is also applicable on this site, which is within Zone 1. In 2019, the financial contribution was £80 per sqm; as of 2023, the financial contribution is £86.06 per sqm.

5.0 Key Development Considerations

5.1 This section underlines why the proposed development is both acceptable and desirable with regards to the planning policy context as discussed in Section 4. This section will similarly address the technical considerations that are relevant to the proposals.

Pre-application

5.2 A pre-application enquiry (ref no. 2021/6233/PRE) for a scheme that varies significantly from the current proposal was submitted in 2021, and a written response was received on 22nd March 2022. The pre-application scheme involved the retention of the public house, the change of use of ancillary floorspace in the upper parts of the pub, reconfiguration of the internal layout across all floors and the erection of a side extension at first, second and third floors to provide one studio apartment and three one-bedroom apartments, along with associated cycle parking.

5.3 In the written response, the Council identified the following issues in relation to the harm the proposed development would cause to the designated heritage assets:

1. Substantial alteration to the late 19th century extension through the loss of its roof and the creation of 2-3 additional storeys on top of the existing extension;
2. The rear elevation of the original early 19th century building is partly demolished and almost entirely obscured by what amounts to a full-height rear extension;
3. The proposed front elevation onto Wren Street is inappropriate to the host listed building, to the listed terrace and to the wider conservation area;
4. Historical gap between the adjacent listed buildings is removed and replaced with built form; and
5. The scale and plan of each floor is not adequately subservient to the listed building, and requires partial demolition of the rear elevation, the introduction of new stair circulation to all floors and the removal of the rear roof slope.

5.4 The Council concluded that the proposals needed to introduce public benefit of a nature adequate to outweigh the potential harm caused to the Conservation area and the Grade II listed public house.

5.5 As such, the revised proposal seeks to resolve the heritage and design concerns by achieving a balance between impacts and enhancements to the Listed Building, which is based on a reduced and completely redesigned scheme with fewer internal alterations, which responds sensitively to the

significance of the heritage assets. Details of the current proposed scheme are elaborated in detail in the Design & Access Statement as well as relevant professional reports enclosed in this application.

Principle of Development

5.6 The Site is located within the established built-up area of Bloomsbury in Central London, where new development is appropriate, indeed, the Pre-application written response (ref no. 2021/6233/PRE) confirms that housing development is a priority in this location:

“In order to meet the Council’s strategic housing targets, policy H1 confirms that self-contained housing will be regarded as the priority land use within the Borough for the plan period. Housing is considered to be appropriate in this location. As such, the development would be compliant with Policy H1 provided that the units meet Council and national residential development standards, and the development did not harm local amenity.”

5.7 According to Policy H1, Camdem Council seeks to deliver 16,800 new dwellings between 2016/18 and 2030/31, of which 11,130 units should be additional self-contained homes.

5.8 The application contributes to the realisation of sustainable development, as defined and emphasised in the NPPF, in the following ways:

Economic

5.9 The proposed development retains and improves the format of the existing public house as ensuring its financial viability long into the future.

5.10 The proposal for new flats would make a positive contribution towards the local economy as it will provide new household of consumers and an increase to local authority revenue. It is likely that the residents of the proposed dwellings would use the public house, contributing to its viability, and local shops within Camden for their services.

5.11 The proposal will contribute two one-bed self-contained flats to the local housing stock, which is in line with the Council’s target of increasing housing provision in the Borough.

5.12 The proposals would provide short-medium term workflow for local building contractors.

Social

5.13 The cultural and historical significance of the Grade II Listed Calthorpe Arms will be maintained and preserved while reinstating some historic fabric.

Environmental

- 5.14 The proposed development includes several enhancements to the fabric of the Grade II Listed public house, that will reveal more of its significance, all the while ensuring the longer-term health of a nationally important heritage asset.
- 5.15 The proposed development will both preserve and enhance the setting of the Conservation Area and nearby designated heritage assets.
- 5.16 The proposed dwelling will have space to store bicycles which encourages sustainable travel.
- 5.17 Car-free development is proposed due to the site location being highly accessible to local public transport network.

Continued Viability of the Public House

- 5.18 The Calthorpe Arms was designated as an Asset of Community Value (“ACV”) on 6th December 2021, with the Council’s decision letter indicating that *“The Calthorpe Arms is popular and well-used and occupies a pivotal role for the community that is based around it.”*
- 5.19 Policy C2 of the Camden Local Plan seeks to retain existing community facilities, recognising their benefit to the community and listing ‘Assets of Community Value’ as a material planning consideration, whilst Policy C4 seeks to protect public houses from change of use, redevelopment and/or demolition.
- 5.20 Policy HC7 of the London Plan seeks to protect public houses where they have a heritage, economic, social or cultural value to the local communities, while resisting redevelopment of associated accommodation, facilities or within the curtilage of the pub that would compromise the operation or viability of the pub.
- 5.21 The Calthorpe Arms will remain fully operational during and after the proposed development given that there is no reduction in the existing trading floorspace of the pub on either ground or first floors.
- 5.22 The existing upper floors, which currently comprise an overlarge manager’s flat of four bedrooms, will be converted to self-contained residential apartments. A manager’s flat will be reinstated, ensuring that the current manager can continue to reside at the public house. The managers flat is accessed via a private staircase/entrance.
- 5.23 The ground floor bar area will be retained in its current layout and condition. The WCs located at ground floor will be reconfigured to allow for the creation of a separate residential access.

- 5.24 The function room at first floor will similarly be retained in its current format, with the addition of a new bar / server area, meaning that drinks can be served from the first floor for functions, enhancing the viability and offering of the pub.
- 5.25 In addition, other enhancements have been proposed to further improve the pub’s viability:
1. Provision of improved toilet facilities, including a unisex disabled toilets, and new female and male toilets;
 2. Introduction of a dumbwaiter to facilitate easier transportation of meals between the ground and first floors;
 3. Removal of a large stud partition in the function room on the first floor to enlarge the existing trading space and provide additional dining covers;
 4. Relocation of manager’s office with ambient storage provided on the first floor.
- 5.26 In compliance with Policy HC7, the trading floorspace and ancillary areas to the public house are preserved and enhanced under the proposed development. The existing tenant’s accommodation, as a four-bedroom unit, currently occupies both the second and third floors of the pub building and is a grossly inefficient use of this space. In addition, this provision exceeds the needs of the existing tenant. Therefore, the ancillary accommodation, in the form of a manager’s flat, is proposed to be relocated to the third floor as a one-bedroom two-person flat.
- 5.27 Servicing arrangements for the pub will remain as they are currently.
- 5.28 Public houses regularly coexist with residential properties. Repurposing underused upper floors above public houses and ancillary outbuildings is a common method of delivering much-needed housing in a sustainable manner, indeed the Applicant has experience of delivering such proposals:
- Landseer Road, Islington (Islington Council, ref no. P2018/0967/FUL): Retrospective permission for the conversion of the first floor ancillary space related to the existing Public House to 2 residential units with associated reconfiguration of internal layout of each unit – Allowed at Appeal on 25th February 2019;
 - John Baird, Muswell Hill (Haringey Council, ref no. HGY/2018/1138): Ground floor, first and second floor extensions to existing public house to provide 3 x one-bedroom flats and 4 x two-bedroom flats at first and second floor level – Delegated approval on 09th April 2018; and
 - Gardeners, Wandsworth (Wandsworth Council, ref no. 22/4249): Change of use of first and second floors from sui generis to residential (Class C3) to provide 5 x 1-bedroom flats – Delegated approval on 26th May 2023.

- 5.29 The proposed development enhances the public house offering and ensures its long-term financial viability, and as a consequence there is no conflict with its status as an ACV.
- 5.30 As such, the proposal is considered to be fully compliant with the Local Plan policies which protect community facilities and will ensure the public house remains a viable business.

Housing Mix

- 5.31 Policy H1 of the Local Plan supports the delivery of self-contained housing provided in conjunction with alternative Sui Generis Use, while utilising underused sites that are suitable for housing in terms of accessibility and amenity and free of physical and environmental constraints.
- 5.32 Policy H6 expects proposed residential development to be of high-quality design, while all self-contained flats to comply with the nationally described space standards.
- 5.33 Policy H7 seeks to secure a range of housing sizes, with housing development, including conversion of non-residential properties, meeting the priorities set out in the Dwelling Size Priorities Table, which highlights two-bedroom and three-bedroom market units having high priority and one-bedroom lower priority.
- 5.34 Although the pre-app written response stated that the previously proposed provision of all one-bedroom units is not considered an appropriate mix of units, Policy H7 further indicates that the Council will take a flexible approach to assessing the proposed housing mix with regard to the character of the development, the site and the area, as well as the site size, and any constraints on developing the site for a mix of homes of different sizes.
- 5.35 The proposed market housing mix consists of a one-bedroom two-person flat and a one-bedroom one person studio. Given the sensitivity of the existing historic fabric of the Grade II Listed building, the proposed mix of small units, providing both a one person flat and a two person flat, is considered provide a mix of unit sizes appropriate to the heritage asset's significance.
- 5.36 The 2017 London Strategic Housing Market Assessment (SHMA) has identified that there is high net requirement for new one-bedroom market dwellings in London between 2016 and 2041. Whilst, having referred to the Camden's SHMA issued in 2016, it reflected that there is a local housing need for 1,000 one-bedroom market units between 2016 and 2031. The sustainable location of the proposed site within the Central London, with easy access to public transport networks, restaurants, shops and public facilities, attracts young working populations, who seeks for convenience and accessibility. The contribution of one-bedroom flats to the local housing stock, especially in this prime

location, would not only demonstrate a more efficient use of redundant floorspace above the existing public house but also offer more cost-effective and appropriately-sized self-contained flats for the local demographic. Therefore the proposed housing size will suit well with the needs of the local community.

- 5.37 Policy H4 of the Local Plan seeks to maximise the supply of affordable housing and expects a contribution from all residential development that provide one or more additional homes and involves a total addition to residential floor space of 100 sqm GIA or more.
- 5.38 The proposed market flats comprise Flat 1 (38 sqm) and Flat 2 (52 sqm), giving a total residential floorspace of 90 sqm. As such, no financial contribution towards affordable housing is required from the proposed development, as the additional residential floorspace falls below the requirement of 100sqm or more set out under Policy H4 of the Camden Local Plan.

Residential Amenity

Accommodation

- 5.39 Policy D6 of the London Plan expects rooms proposed in new dwellings to be in compliance with the specific standards, to ensure that adequately sized rooms are provided with comfortable and functional layouts for future occupiers.
- 5.40 Policy H6 of the Local Plan expects all self-contained homes to meet the Nationally Described Space Standards (“**NDSS**”) which require all proposed residential developments to comply with the standards to ensure future occupiers will enjoy adequate living conditions. The proposed one-bed one-person studio (with a shower room) has a GIA of 38 sqm and the one-bed two-person flat has a GIA of 52 sqm, both of which exceed the minimum gross internal floor space of 37sqm and 50 sqm respectively as set out in the NDSS.
- 5.41 While the NDSS requires a minimum ceiling height of 2.3m for at least 75% of the GIA, the London Plan requires the floor to ceiling height to be 2.5m. As reflected in the proposed elevation plan, the floor to ceiling height of the proposed extension element on second floor is 2.74m, therefore the proposed flats on the second floor would meet both standards for minimum ceiling height.

Amenity Space

- 5.42 Policy D6 of the London Plan requires new housing development to provide adequate external private amenity space, and Policy A2 of the Local Plan expects development to seek opportunities to provide private amenity space.
- 5.43 As confirmed in the Pre-app Written Response, the Council has accepted the fact that there will not be any opportunity to provide amenity space at this site given the *“tight built-up nature of the existing site context”*. The Council also pointed out that St Andrews Gardens opposite the site is an open green space, which future occupants will have access to if needed. Therefore, there is no private amenity space proposed for the proposed two residential units.

Outlook, light and privacy

- 5.44 Policy D3 of the London Plan requires development proposals to deliver appropriate outlook, privacy and amenity, whilst Policy A1 of the Camden Local Plan expects proposed development to protect the quality of life of future occupiers, while considering factors such as visual amenity, privacy and outlook; sunlight, daylight and overshadowing.
- 5.45 Each proposed flat will be dual-aspect with a number of northwest- and southwest-facing windows. Every habitable room will be equipped with at least one window, ensuring each flat receives an adequate level of daylight.
- 5.46 At the same time, the ample windows available at the Calthorpe Arms contribute to the overall living quality by enabling an adequate outlook for future occupiers. In particular, the northwest-facing windows offer views of St Andrew’s Garden, which is a designated Open Space opposite the pub, while the southwest-facing windows face towards Gray’s Inn Road. As such, the distribution of windows creates a diverse of outlook for each flat.
- 5.47 Although the row of terraced houses along Calthorpe Street, especially properties No. 1 to No. 5 (Odds), have north-facing windows looking towards the Calthorpe Arms, the proposed extension element will only include an east-facing window in the bedroom of the proposed Studio Flat. Having said that, given that the separation distance between windows is sufficient, it is anticipated that it will cause minimal overlooking and loss of privacy.
- 5.48 Regarding potential overshadowing, the Calthorpe Arms’ northerly orientation with the majority of the windows facing west and south, and only one facing east, minimises the likelihood of overshadowing issues. Also, the sun’s trajectory rising from the east and setting to the west further

reduces the possibility of the proposed flats being overshadowed by nearby properties. Therefore, it is highly unlikely that the proposed flats will be overshadowed by nearby properties.

Noise

- 5.49 Airtight & Noisecheck Ltd were instructed by Punch Partnerships (PML) Ltd to undertake a Noise Impact Assessment (NIA) at the Calthorpe Arms, Bloomsbury, London WC1X 8SR.
- 5.50 The survey was undertaken for a 48hour period using two external microphone locations. The microphone locations were used to determine the ambient noise levels at the facades of the proposed development site in relation to the noise sources of road traffic, public house and public house plants.
- 5.51 The findings of this survey indicate that the noise associated with road traffic, the public house and public house plant will not have an adverse impact on the proposed residential dwellings, providing the necessary mitigation measures are applied to the site, which are as follow:
 - 1. Measures applied to the dwellings to improve overheating & ventilation
 - 2. Install a robust glazing system to the dwellings to protect the residents from external noise emissions when closed
 - 3. Alternative ventilation installed to dwellings to ensure ventilation when windows are closed
 - 4. Possible mitigation of public house plant to reduce noise break out levels at the façade
 - 5. Upgrade the separating floor between the dwellings and public house to reduce sound transmission
- 5.52 The mitigation measures listed within the report offer suitable sound reduction for the building elements, and provided they are implemented throughout the site, then the future residents should be able to enjoy a reasonable standard of living. Upon implementation of the mitigation measures, the internal & external criteria of BS8233:2014 should be met with the noise sensitive bedrooms at the proposed development.
- 5.53 The measures taken by the client should ensure the future residents will not be adversely affected by the noise sources associated with the activities in the public house, plant and road traffic.
- 5.54 As explained in the section below, the heritage impacts of the proposed noise mitigation measures have been carefully considered to ensure that there is no harm to the historic fabric of the building.
- 5.55 The conclusion of the report illustrates that suitable mitigation measures are proposed to ensure that future residents are not adversely affected by noise associated with the public house, plant and road traffic.

Heritage

5.56 Heritage Information Ltd has been instructed to prepare a Heritage Statement to support this Application. The report ascertains and assesses the impact of the proposed development on the heritage significance of the identified heritage assets in the locality, including the Grade II listed Calthorpe Arms, the Bloomsbury Conservation Area and the Grade II listed 2-9 Wren Street.

The Calthorpe Arms

- 5.57 The Calthorpe Arms, located on the corner plot of Gray's Inn Road and Wren Street, was designated as a Grade II Listed Building in 1974, with its significance lying in its architectural and artistic interest, and historic interest. The public house consists of two parts: a four-storey 1820s building with a basement standing on the corner of Gray's Inn Road and Wren Street, and a two-storey Edwardian (c. 1904) extension on Wren Street. The Heritage Statement details the historic architectural fabric and characteristics of the interior, and the heritage background of the public house.
- 5.58 The architectural and artistic interest of the Calthorpe Arms is of a medium level of significance, in particular of the original building element due to its Georgian exterior. The pub is also of historic interest as part of the early nineteenth-century townscape of Gray's Inn Road and its side street, illustrating the nature of early nineteenth-century pub architecture, despite significant changes made to both the exterior and interior of the building.
- 5.59 The setting of the Calthorpe Arms contributes to understanding and appreciation its significance, with the corner site allowing the architectural qualities of the 1820s building to be appreciated, particularly from the opposite side of Gray's Inn Road and looking west along Wren Street.
- 5.60 The proposed extension above the Edwardian extension will have an impact on the character and appearance of the pub due to the impact on of the existing external appearance and the loss of the historic fabric of the parapet walls and chimneys. However, these features lack significant historic and architectural interest, and the proposed extension will cause a minimal amount of harm to the overall significance of the Grade II Listed Building.
- 5.61 On the other hand, the proposed design of the new extensions, in terms of materials, floor heights, wall-to-window ratio and a generally traditional appearance, will retain the relationship with the host pub building, and ensure the corner building remains as the taller and dominant element of the site. As such, the magnitude of the impact on the external appearance of the listed building will be

moderate, in fact harm has been minimised by the relatively modest additions and the design being in-keep with the existing character of the listed building.

5.62 The Report implies that there has been a lack of investment in the restoration of the historic fabric of this Grade II Listed Building, and as such this proposed development offers an opportunity to restore and preserve it for future use.

5.63 While the historic fabric will be retained with some being restored, the proposed internal reconfiguration of the Calthorpe Arms would entail the loss of a small amount of recent fabric, mostly from the twentieth-century which is of low or neutral significance. It is proposed to integrate the new accommodation into the extension and to improve the arrangement of the existing accommodation. The Heritage Statement has detailed all the changes proposed to the existing fabric and concluded that the magnitude of the impact on the internal plan form and historic fabric of the Grade II Listed Building from the proposed reconfiguration will be minimal, and the impact on its significance would be neutral.

5.64 As part of the proposed extensions and the internal reconfiguration, a range of heritage enhancements has also been incorporated into the proposed development, including:

1. Reinstating fireplaces throughout the 1820s building
2. Introducing chimneypieces of suitable Regency design
3. Replacing modern doors on the upper floors with traditional four-panel doors
4. Replacing existing plate-glass 'one over one' sash windows of the 1820s building with new timber-framed, single-glazed 'six over six' sash windows with glazing bar
5. Replacing existing windows in the c.1904 extension element with 'one over one' timber sash windows, which will also be used in the proposed infill extension
6. New coping stone to be added to the parapet wall to replace the existing one which is being removed as part of the infill extension

5.65 Apart from the above enhancements, new sash windows will be installed with secondary glazing to improve energy efficiency and sound insulation. Compared to double-glazed window, secondary glazing will have minimal impact on the external appearance of the historical building, with any potential impact further mitigated by careful design of the window framing. Meanwhile, a floor lining will be installed above the function room, and wall linings will be added to the inside face of the external walls to achieve acoustic separation, with their minimal visual on historic character being mitigated by the re-use of the historic chimneypiece, resulting in a negligible residual impact.

5.66 Overall, the proposed development will have a moderate and neutral-to-positive impact on the special interest of the Calthorpe Arms, while any potential harm will be outweighed by the proposed historical enhancements.

Bloomsbury Conservation Area

- 5.67 The site is located within the Sub Area 14: Calthorpe Street/Frederick Street of the Bloomsbury Conservation Area. According to the Conservation Area Appraisal and Management Strategy, the Calthorpe Arms is categorised as having a ‘Shopfront of merit’ and the significant views in the area include ‘views to largely unaltered rears of listed terraces’.
- 5.68 The Conservation Area has some archaeological potential, in light of the St. Andrew’ Garden, a post-Medieval cemetery designated as an Archaeology Priority Area in the Sub Area; and a wide variety of materials and building methods of various periods can be found in the Conservation Area.
- 5.69 The Conservation Area has medium to high level of significance arising from its architectural and artistic interest, given that the underlying architectural character is made up of Georgian terraces and squares, with the predominant materials being yellow London stock brick and stucco.
- 5.70 The Area represents a period of London’s early expansion northwards, reflected through the buildings, open spaces and well-preserved street pattern of the area, demonstrating that the heritage asset is of high historic interest.
- 5.71 The Calthorpe Arms, located on a corner plot, represents a prominent and important part of the historic townscape of Gray’s Inn Road and its subsidiary streets, making a positive contribution to the character and appearance of the Conservation Area. In light of the significance of this corner building to the Conservation Area, it has been proposed to replace the existing plate-glass windows with new sash windows, which will be more appropriate to the Georgian character of the vicinity.
- 5.72 At the same time, the design of the proposed extension, a harmonious but distinct addition to the existing building, will make a neutral-to-positive contribution to the character of the Conservation Area.
- 5.73 The new extension will also form a better balance with no. 242-250 Gray’s Inn Road, which is opposite the Calthorpe Arms, by maintaining the same parapet line and not rivalling the height of the corner building.
- 5.74 As such, the proposed extension element will have a minimal and neutral-to-positive impact on the character and appearance of the Bloomsbury Conservation Area.

2 – 9 Wren Street

- 5.75 No. 2-9 Wren Street form part of an important historic townscape with their neighbouring buildings, including the Calthorpe Arms, representing good examples of Georgian design, well-presented to both front and rear elevations. Their setting contributes to the understanding and appreciation of the significance of the listed building within the wider historic townscape of the area.
- 5.76 Although the proposed extension element will be visible along Wren Street, and from Green Yard and St Andrew’s Gardens, the proposed design will be sympathetic to the Grade II listed 2-9 Wren Street due to its similar scale, materials, wall-to-window ratio and use of sash windows. The lower parapet line of the new extension creates a visual gap, which preserves the separation of the terraces from the 1820s corner building of the Calthorpe Arms.
- 5.77 As such, the extension will be in keep with the local character without appearing incongruous, having moderate to neutral impact on the setting of this row of Grade II listed buildings.

Energy and Sustainability

- 5.78 SRE has been instructed to prepare an Energy and Sustainability Statement to support this Application. The report demonstrates the measures incorporated into the design of the proposed development at Calthorpe Arms.
- 5.79 The proposed energy strategy has been developed in line with the Greater London Authority Energy Hierarchy of Lean, Clean, Green and Seen, along with the local Camden policy guidance. The strategy for the proposed development is summarised below:
- High performance building fabric
 - High efficiency light-emitting diode lighting
 - Wastewater heat recovery systems applied to each shower
 - High efficiency air source heat pumps supplying heating and hot water to the two units
 - Low water consumption fixtures
- 5.80 The proposed development aims to minimise its impact on the environment at both construction and operational phases through implementing a range of sustainability measures proposed in the sustainability strategy, which ensures sustainable residential dwellings are provided. The proposed measures are summarised as follow:
- Replacing gas boilers with air source heat pumps to mitigate any potential air pollution contributions at point of use;

- The proposed development is at very low risk of flooding from surface water and rivers;
- The proposed development will not detrimentally affect ecology;
- 95% waste will be reused/recycled/recovered during construction and demolition;
- Internal water use will be reduced by fitting low capacity or flow restrictors;
- Sustainable construction techniques and materials, inclusive design, site management and procurement procedures will be adopted.

5.81 For detailed SAP calculations, please refer to the SAP worksheets and SAP summary reports enclosed as part of this application.

Fire Statement

5.82 PLC has prepared a Fire Statement detailing fire safety measures, construction, means of evacuation and firefighting access proposed as part of the development, along with a plan annotated with potential locations for fire tender parking and assembly point for residents and pub customers.

5.83 Smoke and heat detectors will be installed within the proposed flats and communal areas along with emergency lighting, while the existing fire detection within the pub trading floorspace will be retained or upgraded. In addition, a fully linked commercial and residential alarm system will be available to ensure early warning of a fire that breaks out is provided for all occupants.

5.84 The existing separating floor and walls between the retained public house and flats on the upper floors will be updated (where applicable) to achieve the required minimum fire protection. All walls forming part of the escape route will be upgraded to ensure sufficient fire protection to be provided to communal areas with all flats' entrance door fitted with smoke seals and self-closing device.

5.85 The proposed layout of the flats and access has been designed to ensure safe and suitable access by fire brigade.

5.86 For further information, please refer to the fire statement submitted.

Construction Management Plan

5.87 As highlighted in the pre-app written response, a construction management plan will be prepared, and a financial contribution for the implementation of a Construction Management Plan and a Construction Impact Bond via a Section 106 Agreement, will be secured in accordance with Policy A1 of the Local Plan, in order to minimise the impact on any nearby highway infrastructure and the neighbouring community.

6.0 Conclusion

- 6.1 CPC produced this Planning Statement in support of Punch Partnerships (PML) Limited's planning and listed application to retain and reconfigure the existing Calthorpe Arms; retain the public house manager's flat (Sui Generis) at the third storey; convert the first and second storeys of the public house to provide two residential apartments (Use Class C3), including a two-storey infill extension, internal and external alterations; erect a lockable bike shed on Wren Street; and relocate and replace the existing kitchen extract system.
- 6.2 This Statement and enclosed documentation demonstrate that the proposed development has been designed in accordance with the relevant regional, local and national planning policies and responds positively to the locale.
- 6.3 The proposed development would retain the existing Calthorpe Arms public house while repurposing the underused upper floors. The proposed alteration to the pub's trading spaces on the ground and first floors, including the improved toilet facilities, new dumb waiter and bar area, would ensure the future viability of the pub business will not be affected but instead enhanced.
- 6.4 The proposed design of the new extension will utilise the same materials as the Grade II Listed Calthorpe Arms, while the scale will be in keeping with the historical character of the locality and respect the significance of the identified heritage assets in the vicinity.
- 6.5 The proposed extension introduces an alteration to the existing appearance of the heritage asset and the setting of 2 Wren Street, leading to the loss of a minimal amount of historic fabric from the Grade II listed building. However, given the modest size of the extension element and the contextual nature of the design, there will only be a very low level of harm, which is outweighed and mitigated by the proposed enhancements and other public benefits which result from the proposed development.
- 6.6 The advice provided in the Council's written response to the pre-application enquiry (ref no. 2021/6233/PRE) has been considered in the current application, and the proposed design has been revised to address the concerns raised during the pre-application stage. The Council is therefore politely invited to grant planning permission for the proposals without undue delay.