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Ms Ellie Fowler
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By email

Dear Ms Fowler,

Re: Calthorpe Arms, 252 Gray's Inn Road, London, WC1X 8JR

Thank you for submitting a pre-planning application enquiry for the above property. These notes follow on from a pre-application meeting dated 16/02/22.

1. **Proposal**

1.1. Advice is requested in relation to the following proposed developments:

- 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

2. **Site description**

2.1. The Calthorpe Arms is a GII listed public house in the Bloomsbury Conservation Area. It is attached to the GII listed terrace at 244-250 (even), Grays Inn Road and to the GII listed terrace at 2-9 Wren Street. It makes a positive contribution to the character and appearance of the conservation area. As a listed building its significance includes its architectural design and materials, plan-form, evidential value as a C19th pub and its townscape contribution. Its role in the setting of adjacent listed buildings is also subject to consideration under the NPPF.

2.2. The site has the following constraints:

- Grade II Listed Building
- Conservation Area – Bloomsbury
- Assets of Community Value
- Article 4 Directions Heritage and Conservation
- Article 4 Basements
- CIL Charging Zone
- Central London Area
- CMP Priority Area
- Neighbourhood Area and Forum – Mount Pleasant
- Underground development constraints – Ground water/Slope Stability

3. **Relevant planning history**

First and Second Floors, 250 Gray's Inn Road

- 2020/1916/P – Amalgamation of the first floor unit and second floor unit to create a 1 bedroom unit (Class C3); replacement of the existing front elevation single glazed timber sash windows with like-for-like windows – Granted subject to S106 on 21/09/2020.

4. **Relevant policies and guidance**

- **National Planning Policy Framework (2021)**
- **London Plan (2021)**
- **LB Camden Local Plan (2017)**
 - H1 Maximising housing supply
 - H4 Maximising the supply of affordable housing
 - H6 Housing choice and mix
 - H7 Large and small homes
 - A1 Managing the impact of development
 - A4 Noise and vibration
 - D1 Design
 - D2 Heritage
 - C1 Health & Well-being
 - C4 Public Houses
 - C5 Safety and security
 - C6 Access for all
 - CC1 Climate change mitigation
 - CC2 Adapting to climate change
 - CC3 Water and flooding
 - CC4 Air quality
 - CC5 Waste
 - T1 Prioritising walking, cycling and public transport
 - T2 Parking and car-free development
 - T3 Transport Infrastructure
 - T4 Sustainable movement of goods and materials
 - DM1 Delivery and monitoring
- **Supplementary Guidance**
 - Air Quality CPG (2021)
 - Access CPG (2019)
 - Community
 - Amenity CPG (2021)
 - Design CPG (2021)
 - Housing CPG (2021)
 - Home Improvements CPG (2021)
 - Energy Efficiency and Adaptation CPG (2021)
 - Transport CPG (2021)
 - Developer Contributions CPG (2019)
- **Bloomsbury Conservation Area appraisal and management strategy, 2011.**

5. **Assessment**

5.1. The main issues to consider in this case are as follows:

- Principle of Land Use
- Standard of accommodation
- Asset of Community Value
- Design and conservation
- Impact on the neighbour amenity
- Transport
- Energy and Sustainability
- Planning Obligations

6. **Principle of land use**

6.1. 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. The upper floors of the existing pub are currently utilised as a managers flat as an ancillary use to the pub space. In line with Policy H7 below, this will be retained and associated accommodation will be reinstated as a studio apartment for the manager.

Affordable housing

6.2. Policy H4 of the Camden Local Plan 2017 indicates that the Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. Policy H4 also indicates that where developments have capacity for 10 or more additional dwellings, the affordable housing should be provided on site. Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing.

6.3. The Council will seek the maximum reasonable amount of affordable housing in line with points (a) to (i) of policy H4. Please refer to policy H4 (Maximising the supply of affordable housing) and the Interim Housing CPG for more details.

6.4. The proposal would provide 1 x studio unit to re-provide the pub manager's accommodation and 3 x 1 bed units, 3 additional homes are being created, involving additional residential floorspace which needs to be specified. According to the measurements of the new units, flats 1 (45.5sqm), 3 (50sqm) and the new lobby and toilets area (24sqm) on the first floor, allow the total of additional floorspace to be 119.5 sqm, this suggests that the proposal triggers the requirement for a contribution towards affordable housing.

6.5. Targets are based on an assessment of development capacity whereby 100sqm GIA of housing floorspace is generally considered to create capacity for one home and a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% for each home added to capacity. The financial contribution would be secured by section 106 legal agreement, if the application was approved.

Dwelling mix

- 6.6. Policy H7 of the Local Plan aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. The policy requires that all housing development, including conversion of existing homes and non-residential properties contributes to meeting the priorities set out in the Dwelling Size Priorities Table (DSPT) (see below); and includes a mix of large (3 or more bedrooms) and small homes.

Table 1: Dwelling Size Priorities

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

The pre-app proposes:

No. of bedrooms	Proposed
Studio	1
1	3
TOTAL	4

- 6.7. Insofar as the DSPT indicates that 2-bed market and 3-bed units have high priority, the provision of all 1 bed units is not considered an appropriate mix of units. The existing unit is a 4 bedroom unit over two floors which is considered medium priority. Council officers would advise to re-visit this and see if a better mix of units could be created over the two floors so that it's in accordance with Policy H7.

7. Standard of accommodation

- 7.1. Policy D1 of the Local Plan seeks to secure high quality design in development. In relation to housing, part (n) of the policy requires development to provide a high standard of accommodation. The proposals would also need to comply with the sub-text (within paragraph 7.32).

- 7.2. The proposal would provide:

Dwelling type	Floor space (sqm)	Required standard (sqm)
1 bed 1p Studio	45.5	39(37)
1 bed 2 person	53.5	50
1 bed 2 person	50	50
1 bed 2 person	50	50

- 7.3. All of the flats would meet the government's nationally described space standards, which is welcomed. Furthermore, all would be self-contained with their own entrances. The space standards set a minimum ceiling height of 2.3 metres for at least 75% of the gross internal area of a dwelling. From the section drawings submitted it appears that the ceiling height is met for both first and second floors.

- 7.4. Not all of the new units are dual-aspect; units 2 and 4 are single aspect. However, given that there are windows to all the habitable rooms on both Calthorpe Street and on Wren Street it may be considered acceptable, on balance, given that the property is a corner site and joins onto No.250 Calthorpe Street which makes it difficult to provide a dual-aspect unit in this part of the building. Nevertheless, it is considered that all units would have good natural light, ventilation.
- 7.5. No amenity space is proposed for these new units, given the tight built up nature of the existing site context there is no way to add in amenity space on the current site, however there is St Andrews Gardens opposite the site which is open green space which can be used by residents if required.

8. Asset of Community Value

- 8.1. The nomination to list the Calthorpe Arms as an asset of community value was made on 19th October 2021 by the Calthorpe Street Residents' Association (CSRA).
- 8.2. In order for a property to be listed as an asset of community value, it must be nominated by an eligible body (under s88 of the Localism Act 2011 and regulations 4 and 5 of the Assets of Community Value (England) Regulations 2012) and the Council must be satisfied that it is an asset of community value as defined in the legislation (in s89 of the Localism Act 2011). In considering the nomination the Council concluded that the Calthorpe Arms met both of these conditions.
- 8.3. The organisation which nominated The Calthorpe Arms, the Calthorpe Street Residents Association is an 'unincorporated body' whose membership includes at least 21 individuals living in Camden or a neighbouring local authority area.
- 8.4. The following extract from the Council's decision letter (dated 06/12/2021):

*"The overall impression from the nomination and from the Council's own visit is that The Calthorpe Arms is popular and well-used and occupies a pivotal role for the community that is based around it. Groups holding meetings and activities at the pub are numerous and wide ranging. They will to varying extents help to consolidate cultural, recreational and/or sporting interests. The pub has clearly been instrumental in bringing people together and helping people to get to know one another and a positive force for social cohesion. It is highly respected not just by residents but local employees and visitors as well. Its purpose and reason for existing would appear to be principally the strong links it enjoys with the community, which has helped to shape the pub's evolution and its offer to patrons over the years. Activities held in the pub mirror local interests and the various clubs and meetings described have been able to develop over time from having access to these facilities. There is a sense of members of the community returning to the Calthorpe many times to fulfil their social life. The pub has contributed to the community's connections and belonging/group identity and its patrons and staff have been able to live out their lives within its walls.
"No evidence has been provided that leads the Council to conclude that The Calthorpe Arms does not meet the criteria for being designated as an Asset of Community Value."*

- 8.5. The above stated decision declares the site as an asset of community value and so this would need to be considered as a material planning consideration. We consider the public house to be a community asset and the designation of the property as an ACV further serves to demonstrate that the pub is highly regarded by the local community, helps to support the community's sustainability and contributes to residents' social interests and wellbeing. The impact of the proposals to alter the existing building on the local community and the pub's

designation as an ACV must therefore be explored. The Council would expect the applicant to engage the nominating body (Calthorpe Street Residents Association) for their views in preparation to submit a planning application.

- 8.6. On 7th January 2022, the Council received a request from the Calthorpe Arm's landowner for an internal review of its decision. During an internal review or an appeal to the First-tier Tribunal, the listing of the property as an ACV remains in force. Therefore the implications of a property being designated as an ACV continue to apply unless and until an asset is removed from the list of assets.
- 8.7. Having considered the above position and assessing the current proposals, the subject is deemed a community asset and the proposals would undermine and compromise the existing public house and would adversely impact on the pub's community, historic and townscape value; thus being contrary to Policy C4 (Public houses) within Camden's Local Plan, 2017 (and other policy/guidance stated below) and would therefore not be supported.

9. Design and Conservation

- 9.1. The Council's design policies are aimed at achieving the highest standard of design in all developments. The following considerations contained within policy D1 are relevant to the application: development should respect local context and character; comprise details and materials that are of high quality and complement the local character; and respond to natural features. Policy D2 (Heritage) states that the council will preserve and where appropriate enhance Camden's heritage assets and their settings.
- 9.2. The Calthorpe Arms is a GII listed public house in the Bloomsbury Conservation Area. As the subject site is a Grade II listed building, the council has a statutory duty to pay special attention to the desirability of preserving the listed building and its features of special architectural or historic interest, under s.16 and s.66 of the Planning (Listed Buildings and Conservation Area) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.
- 9.3. The application site is located within the Bloomsbury Conservation Area, wherein the Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area, in accordance with Section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).
- 9.4. Camden's Design CPG emphasises Camden's commitment to design excellence, and expects development schemes to consider:
- The context of a development and its surrounding area
 - The use, design and function of the building itself
 - Having regard to scale, form and massing of neighbouring buildings
 - Using materials and detailing that are sympathetic to the host building and buildings nearby
 - Using good quality sustainable materials
 - Creating well connected public spaces and good quality public realm
 - Opportunities for promoting health and well-being
 - Opportunities for improving the character and quality of an area
 - Respecting and preserving existing architectural features, such as projecting bays or chimney stacks
 - Respecting and preserving the historic pattern where it exists, and the established townscape of the surrounding area, including the ratio of built to unbuilt space

- The effects of the scheme on important local views

9.5. The Design CPG also states its guidance on roof alterations: A roof alteration or addition is likely to be unacceptable in the following circumstances where there is likely to be an adverse effect on the skyline, the appearance of the building or the surrounding street scene:

- Buildings which have a roofline that is exposed to important London wide and local views from public spaces
- Buildings whose roof construction or form are unsuitable for roof additions
- Buildings designed as a complete composition where its architectural style would be undermined by any addition at roof level
- The impact on adjoining properties both in terms of bulk and design and amenity of neighbours would be detrimental, e.g. due to a loss of light from the additional height
- Buildings that are part of a group where differing heights add visual interest and where a roof extension would detract from this variety of form
- Where the scale and proportions of the building would be overwhelmed by an additional extension/storeys

9.6. The Bloomsbury Conservation Area Management plan also has regard to this site and its context as follows:

- 4.16 Development occurred between 1801 and 1832 to the east of Gray's Inn Road, on land sloping down to the River Fleet, The scale of these streets is lesser than those to the west; this may be due to their proximity to river Acton Street, Frederick Street and Ampton Street were built to the designs of William and Thomas Cubitt. Wren Street and Calthorpe Street, further to the south, were planned by the Cubitt brothers from 1816 and was developed up to around 1850.

Calthorpe Street/Wren Street/Pakenham Street

- 5.257 This is a consistent area of terraces, adhering to a plainer form of classicism than their neighbours to the north. Properties date from the 1820s in the west to the 1840s in the east.

9.7. Comments from officers

External works

- In assessing the development proposals with the above CPG stated guidance it appears that the proposal would fail to meet the majority of the criterion.
- The character of the site and its immediate surroundings is identified as being a consistent area of terraces dating from the nineteenth-century, and it is clearly this character which the Council is obliged to preserve and enhance. The scale, location, design and materials of the proposed development disrupt the nineteenth century form and appearance of the site and its neighbours, and thereby fail to preserve or enhance the character and appearance, and the positive contribution which the subject site otherwise makes to the character and appearance of the conservation area.
- The subject site was listed at GII in 1974:
End of terrace public house. Early C19. Yellow stock brick. 4 storeys and cellar. 2 windows and 3-window return to Wren Street, plus 2 and single storey, 4-window extension to Wren Street return. C20 wooden public house frontage with Corinthian pilasters carrying entablature with modillion cornice. Plain stucco 1st floor sill band. Gauged brick flat arches

to recessed 2-pane sashes. Parapet. Extension with 1st floor 2-light bowed oriel window. INTERIOR: with early C20 grained bar counter and back. List Entry Number: 1113130

- Although the extension on the Wren Street frontage dates from the late C19th it is clearly part of the significance of the building and benefits from the same degree of statutory protection as the older part of the building. The proposals substantially alter the late C19th extension through the loss of its roof and the creation of 2-3 additional storeys on top of the existing late C19th extension. In addition to this, the rear elevation of the original early C19th building is partly demolished and almost entirely obscured by what amounts to a full-height rear extension.
- Furthermore, the proposed elevation treatment to the front elevation onto Wren Street is considered to be inappropriate to the host listed building, to the listed terrace and to the wider conservation area.
- The works also have an impact on the setting of adjacent listed buildings, especially the terrace at Wren Street, where an historic gap would be entirely removed and replaced with built form.

9.8. **Internal works**

- The impact of the proposal on the plan-form and circulation of the listed building is considerable, and harmful. The scale and plan of each floor is not adequately subservient to the listed building, and requires demolition of parts of the rear elevation, the introduction of new stair circulation to all floors and the removal of the rear roof slope.
- There are works of internal reconfiguration which may be acceptable depending on the age of the fabric affected, and the impact of new service runs etc.

10. **Neighbouring Amenity**

- 10.1. Policy A1 seeks to protect the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of residents. This includes factors such as privacy, outlook, implications to natural light, artificial light spill, odour and fumes as well as impacts caused from the construction phase of development. Policy A4 seeks to ensure that residents are not adversely impacted upon by virtue of noise or vibrations.

Officer comments:

- The application site is surrounded on both sides by residential properties (No.2 Wren Street and 248 and 250 Grays Inn Road and Mews of single storey properties within Green Yard directly behind the site.
- From the information provided it is considered that the site's relationship to adjacent properties is one of numerous challenges for the redevelopment potential of the site especially in regards to loss of light to neighbouring windows, sense of enclosure, overshadowing to neighbouring properties by infilling the side gap.
- By infilling the vacant side gap to the existing building it is considered that there may be overshadowing and a sense of enclosure created for neighbouring properties to the south (Nos. 250, 248, 246 & 244 Grays Inn Road and the mews houses along Green Yard) and loss of light to their rear windows.
- A Daylight and Sunlight Assessment should be undertaken to support any development on the site. Such an assessment should include a full schedule of the neighbouring windows and amenity areas. Please see chapter 3 of the Amenity CPG for further guidance in the preparation of such assessments.
- Further to the above, officers note that unless properly managed, the construction phase of the development has the potential to cause significant disruption to the residential amenities of neighbouring occupiers. Due to the corner location and demolition proposed a

Construction Management Plan would need to be secured as a Section 106 planning obligation if the scheme were to come forward.

11. Transport

Vehicular parking

11.1. Policy T2 (Parking and car-free development) of the Camden Local Plan 2017 requires all new residential developments within the Borough to be car free. The site currently benefits from no on street car parking. If an application to create new residential units was approved, a legal agreement would secure the development as car-free, and would prevent future occupiers from obtaining on-street parking permits.

Cycle parking

11.2. In line with the Council's policy T1 as well as London Plan requirements, all new residential units should include adequate provision for cycle storage.

11.3. The Ground floor layout shows a cycle hangar for six bikes located on the forecourt area between the building and the footway on Wren Street. The dimensions of the cycle hangar are approximately 5.4m length, 1.4m wide/depth and 1.3m in height. . Furthermore, we know that the forecourt has a width of around 1.6m and the width of a standard bike hangar is more than 2m, so a standard hangar would not fit on the space available. Whilst we would accept the principle of cycle storage being located on the forecourt; the structure, including any doors or lids when opening, would need to be completely clear of the public footway. The structure would also need to be secure and fully protected from the weather in accordance with CPG Transport and the London Cycling Design Standards.

Highways contribution

11.4. The public highway in the general vicinity of the site is likely to sustain damage as a direct result of the basement excavation and demolition activities. We would therefore need to secure a highways contribution via a legal agreement if planning permission were to be granted in the future. This would allow the Council to repair any damage to the public highway in the general vicinity of the site on completion of the development. The highway works would be implemented by the Council's highways contractor on completion of the development. A cost estimate for the highway works would be prepared by our Engineering team if a full application is submitted.

Construction Management Plan (CMP)

11.5. The site is located within a residential neighbourhood and the Council seeks to ensure that the impact on the highway infrastructure and neighbouring community is minimized. Therefore a Construction Management Plan (CMP), a CMP implementation support contribution of £3,920 and a Construction Impact Bond of £7,500 would be secured as section 106 planning obligations in accordance with Policy A1.

12. Energy and Sustainability

12.1. In line with policies CC1, CC2 and CC3 of the Camden Local Plan 2017, all developments in Camden are required to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation

and sustainable urban drainage. All new residential development will also be required to submit an Energy Statement demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO2 reduction. For more details, see section 8 of the Camden Local Plan 2017.

12.2. All schemes must consider sustainable development principles from the start of the design process and include these in their Design and Access Statement or a Sustainability Statement.

13. **Planning Obligations**

13.1. In light of the above assessment, based upon the information provided at this stage I would advise that were any formal application submitted to the Council and was otherwise supported by officers, the following heads of terms would need to be secured via a legal agreement.

- Car free development
- Highways contribution – to be assessed
- CMP

13.2. This above list may be subject to change.

14. **Conclusion**

14.1. It is strongly advised that this proposal is not brought forward for planning permission and listed building consent on the basis that it would cause less than substantial harm to the conservation area and less than substantial harm to the listed building, and that there is no public benefit of a nature adequate to outweigh the harm to designated heritage assets (namely the listed building and the conservation area).

14.2. These matters are too serious to be mitigated by revision to design, materials, form, or scale; the building appears to be fundamentally unsuitable for any further extension without harm being caused to its significance.

15. **Planning application information**

15.1. However if you still would like to submit a planning application, I would advise you to submit the following for a valid planning application:

- Completed form – [Full planning application and Listed building consent application]
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Demolition plans (elevations)

Supporting information

- Acoustic report (incorporated Noise, Vibration & Ventilation Assessment and Noise Impact Assessment for any plant equipment required)
- Daylight / Sunlight report (internal / external)
- Design and access statement
- Draft Construction Management Plan (in line with pro forma)

- Energy / Sustainability Statements
- Heritage Statement
- SUDS pro-forma
- Planning statement (Inc. a full schedule of areas by land use)
- Sample photographs/manufacturer details of proposed facing materials (if possible at this stage)
- Please see supporting information for planning applications for more information.

15.2. We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by sending out e-alerts, putting up notices on or near the site and, advertising in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact me direct.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Sent Via Email

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