

The Blue Lion, Gray's Inn Road Planning Statement

Lambournes Surveyors Ltd

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LICHFIELDS

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1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of Lambournes Surveyors Ltd ('the Applicant') to accompany a full planning application in respect of Proposed Development at The Blue Lion, Gray's Inn Road, London ('the Site').

1.2 The planning application proposes the refurbishment of the existing pub at basement and ground floor level and the refurbishment and extension of the residential accommodation to provide four new residential units at the upper levels.

1.3 The description of the development is (the 'Proposed Development'):

"Refurbishment of the existing public house (Sui Generis) and extension of the residential accommodation (C3) to provide new residential units at the upper levels."

1.4 The purpose of this Planning Statement is to assess the Proposed Development against relevant policies in the statutory development plan, having regard to other material planning considerations and the relevant statutory tests. It draws upon and should be read in conjunction with other design and technical documents accompanying this application.

Background

1.5 The Site was the subject of a planning application for redevelopment to refurbish the pub (at basement and ground floor level) and to provide seven new residential flats at the upper levels (ref. 2022/3534/P). The application was refused under delegated authority by the London Borough of Camden ('LBC') in November 2022.

1.6 Following the refusal of planning permission last year, the Applicant is submitting a new planning application for a revised scheme at the Site which addresses both the previous reasons for refusal and current planning policy. The current proposals involve the refurbishment of the existing pub and extension of the residential accommodation to provide an enhanced and refurbished pub with the creation of four new residential units at the upper levels.

1.7 In the development of these proposals, the Applicant has engaged in pre-application discussions with planning and conservation officers at the LBC and presented the scheme to the Brownlow Mews Society.

Planning Benefits

1.8 The development will yield a range of planning benefits, which weigh in favour of the application, including:

- 1 Retention and enhancement of an existing public house to ensure its long term viability.
- 2 Optimisation of a brownfield site in a highly accessible and sustainable location.
- 3 Delivery of four high-quality residential units which will contribute to meeting housing need within Camden in (net gain of 2 units).

-
- 4 A Proposed Development which is sensitive to the local context and character of its immediate surroundings and is of high-quality design.
 - 5 53% reduction in regulated CO2 emissions over the existing building baseline and a 10% reduction over the GLA's Appendix 3 or Part L 2021 baseline.
 - 6 Provision of good quality cycle parking, promoting sustainable travel behaviour among residents.

Scope of the Application

- 1.9 The planning application submission comprises the following:

Application Documents – for approval

- 1 Forms and certificates
- 2 Site Location Plan (319_PL_001);
- 3 Block Plan (319_PL-002);
- 4 Planning drawings prepared by Tony Fretton architects;
 - a Existing Ground Floor Plan (319_PL_100)
 - b Existing First Floor Plan (319_PL_101)
 - c Existing Second Floor Plan (319_PL_102)
 - d Existing Third Floor Plan (319_PL_103)
 - e Existing Basement Plan (319_PL_104)
 - f Existing Brownlow Mews Elevation (319_PL_105)
 - g Existing Brownlow Mews Shopfront Elevation (319_PL_106)
 - h Existing Gray's Inn Road Elevation (319_PL_107)
 - i Existing Section A-A (319_PL_108)
 - j Existing Section B-B (319_PL_109)
 - k Demolition Plan (319_PL_9007)
 - l Proposed Ground Floor Plan (319_PL_200)
 - m Proposed First Floor Plan (319_PL_201)
 - n Proposed Second Floor Plan (319_PL_202)
 - o Proposed Third Floor Plan (319_PL_203)
 - p Proposed Fourth Floor Plan (319_PL_204)
 - q Proposed Basement Plan (319_PL_205)
 - r Proposed Brownlow Mews Elevation (319_PL_300)
 - s Proposed Brownlow Mews Shopfront Elevation (319_PL_301)
 - t Proposed Gray's Inn Road Elevation (319_PL_302)

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- u Proposed Section A-A (319_PL_303)
 - v Proposed Section B-B (319_PL_304)

Submission Documents in Support of the Application – not for approval

- 1 Air Quality Assessment, prepare by Syntegra Group;
- 2 Cover Letter, prepared by Lichfields;
- 3 Daylight, Sunlight and Overshadowing report, prepared by Lichfields;
- 4 Design, Heritage and Access Statement, prepared by Tony Fretton Architects;
- 5 Energy and Sustainability Statement, prepared by Ecolytik;
- 6 Noise Impact Assessment, prepared by Syntegra Group;
- 7 Planning Statement, prepared by Lichfields; and
- 8 Sustainability and Energy Statement, prepared by Ecolytik.

Structure of this Report

1.10

The planning statement comprises the following chapters:

- 1 **Section 2:** provides a description of the Site and its context.
- 2 **Section 3:** summarises the Site’s planning history.
- 3 **Section 4:** details the consultation and engagement undertaken to date.
- 4 **Section 5:** provides a description of the Proposed Development.
- 5 **Section 6:** summarises the relevant national, regional and local planning policy and guidance.
- 6 **Section 7:** assesses the proposed amendments against relevant material planning considerations.
- 7 **Section 8:** sets out the overarching public benefits of the Proposed Development and conclusions.

2.0

Site Background and Context

The Site

2.1

The Site comprises a mid-terrace five storey building including lower ground floor. The ground floor is occupied by a public house (the Blue Lion Inn) with associated storage and cellar space provided at basement level. The upper floors (first, second and third) comprise residential accommodation. One of these flats is currently being leased by the existing pub owner.

2.2

The Site is situated to the west of Gray's Inn Road (A5200), in close proximity to the junction with Calthorpe Street (B502) that runs west to east. The main entrance to the public house is from Gray's Inn Road but there is also a secondary access from the rear elevation fronting Brownlow Mews. Access to the existing residential accommodation is via a separate door off Brownlow Mews and there is also internal access through the pub. External amenity space for the existing residential accommodation is provided on a roof terrace to the rear of the Site. There is no external space associated within the pub within the Site boundary. However, it is understood that part of Brownlow Mews is used as external space for pub customers.

2.3

The Site is entirely within the administrative boundary of LBC, in the southern part of the Borough.

Figure 2.1 Aerial Image of the Site



Source: Google Earth

2.4

The building does not have a uniform height across the Site. The front of the building, which faces Gray's Inn Road, is four storeys in height (above street level). The building

steps down to a single storey fronting Brownlow Mews, the roof of which is used as a roof terrace.

- 2.5 The Site is not listed but is located within the Bloomsbury Conservation Area (Sub Area 10) and is identified as a *'positive building'* within the conservation area appraisal (see Section 6 for further detail). The Site is also located within a designated archaeological priority area (London Suburbs, 2).
- 2.6 Several statutorily listed heritage assets are within the immediate vicinity of the Site, including two Grade II Listed Parks and Gardens. Within 60m of the Site are the following listed assets:
- 1 121 Gray's Inn Road and attached railings (Grade II Listed, list entry no. 1113101).
 - 2 39-47 and 49-62 Doughty Steet and attached railings (Grade II Listed, list entry no. 1356734).
 - 3 48 Doughty Street, Charles Dickens house and attached railings (Grade I Listed, list entry no. 1356735).
 - 4 3-7 Guilford Street and attached railings (Grade II Listed, list entry no. 1245854).
 - 5 Bollard with spur stones at entrance to Brownlow Mews, Guilford Street (Grade II Listed, list entry no. 1378646).
- 2.7 The Site has a PTAL (Public Transport Accessibility Level) rating of 6b representing the highest level of access to public transport services. Russell Square underground station is c.570m west and Chancery Lane underground station is c.600m south (both less than a 10-minute walk). Farringdon Station is c.780m southeast and Holborn Station is c.790m southeast (both less than a 15-minute walk). Kings Cross/St Pancras is approximately 900m north. Several bus stops are in close proximity to the Site on Gray's Inn Road, with frequent services to other areas of central London.

The Surrounding Context

- 2.8 The surrounding properties within the terrace comprise a mix of commercial uses at ground floor level with residential uses above. The adjoining building to the north is a four-storey building that comprises a retail unit on the ground floor ('Essential Express Food') with residential flats above. The building has a shallower pitch to the roof and is therefore lower in height. To the south is a five-storey building that is occupied by the UCL Dental School. To the east, on the other side of Gray's Inn Road, lies a modern six storey office block.
- 2.9 Both adjoining buildings are deeper at the upper levels meaning that the residential elements of the Site are recessed from their neighbours when viewed from the west. In addition, the majority of buildings within the terrace step down to three storeys at the rear fronting the Mews. In comparison, the Site is the exception insofar that it steps down to just a single storey at the rear. In combination with the narrower depth of the upper storeys, there is a significantly less massing on the Site than the adjoining properties. It creates a gap at the rear between adjacent buildings which are all taller than the existing property at the Site.

2.10

Buildings on the opposite side of Brownlow Mews to the Site are two storeys in height and are in commercial use. Other buildings to the south of the Site along Brownlow Mews comprise a mix of commercial and residential uses.

Figure 2.2 Rear View of the Site in Comparison with Adjoining Buildings



Source: Google Earth

3.0 Planning History

- 3.1 The following section sets out the planning history of the Site, based on a review of LBC's online planning register. The original planning permission at the Site is not available online due to the age of the building. However, the established use of the building is a public house at ground and basement level with residential use above (C3 Use Class). This is confirmed in the officer's report for the most recent 2022 planning application.
- 3.2 The Site's planning history primarily relates to external signage and temporary consents for outside seating. A full list of the Site's planning history is provided at Appendix 1. Key decisions are summarised below.
- 3.3 In 1972, an application to redevelop the pub, provide offices and housing was refused (ref. 12703). The decision notice outlines that the proposal was contrary to LBC's policy aspirations to restrict the growth of office floorspace in the central area of the borough.
- 3.4 In 2007, planning permission was secured for alterations to the front of the Public House comprising the installation of two awnings, wall mounted heaters and lighting to create a 15sqm covered drinking area (ref. 2007/2852/P).
- 3.5 Most recently, a planning application seeking the redevelopment of the pub and provision of seven self-contained housing units was refused at the Site in November 2022 (ref. 2022/3534/P). This application and reasons for refusal are analysed in more detail below.

Planning Application 2022/3534/P

- 3.6 As noted above, a planning application was submitted at the Site in August 2022 for:
- “Partial change of use from pub (Sui Generis) and ancillary accommodation to pub (Sui Generis) and residential (C3) involving the creation of 7 residential units. Erection of three storey rear extension at 1st-3rd floor and two storey roof extension. Erection of rear terraces at 1st-5th floor and ground floor fenestration alterations.” (ref. 2022/3534/P).*
- 3.7 The application was refused under delegated authority by LBC on 24 November 2022. The decision notice included 12 reasons for refusal (see Appendix 2).
- 3.8 In developing the revised scheme for the refurbishment and redevelopment of the Site, consideration has been given to the previous scheme and the reasons for refusal. In particular, the scheme seeks to address each reason for refusal set out in the delegated decision notice and the associated commentary within the planning officer's report.
- 3.9 It should be noted that that previous application referred to the existing residential accommodation as 'ancillary' to the pub. The existing residential use is a self-contained and can be independently occupied when the current lease ends.
- 3.10 The reasons for refusal of the previous application are summarised in Table 3.1 below alongside commentary summarising how the revised proposal address each of these and signposting the relevant section of this report which provides further information.

Table 3.1 Summary of Reasons for Refusal

Refusal No.	Reason for Refusal	Relevant Local Plan Policy	How this has been addressed / Section of this report addressing reason for refusal
1	Loss of ancillary accommodation, storage space and access to outside amenity space would adversely affect the operation of the public house.	C4 (Public houses)	The refurbishment of the lower levels has been designed to ensure that the operation of the pub is optimised to meet the requirements of the existing business. The loss of ancillary and unused storage space has been significantly reduced and the layout will not result in the loss of floorspace which would adversely impact the operation of the pub. Please see paras 7.7–7.17 for further information.
2	Detailed design, height, scale, massing and form of the proposed extensions and alterations, and loss of important architectural features through demolition, would cause harm to the character and appearance of the building and the Bloomsbury Conservation Area.	D1 (Design) and D2 (Heritage)	When compared with the previous proposals at the Site, the scheme is significantly reduced in terms of scale and massing. The existing facade along Gray’s Inn Road remains untouched and there is no increase in height of the overall building. Amendments to the massing of the rear of the building aligns with the surrounding buildings. Minimal demolition is proposed. Please see paras 7.48–7.55 for more information.
3	Failure to justify substantial demolition (i.e. that it is not possible to retain and improve the existing building).	CC1 (Climate change mitigation)	The proposals would not result in the demolition of any floorspace at the Site. Alterations are proposed to the rear elevation to enable amendments to the existing residential levels and is required to accommodate the sensitively designed extensions. Please see para 7.71 for more information.
4	Potential overlooking between flats 01 and 02 at 1st floor and flats 04 and 05 at 3rd floor, and in absence of a comprehensive daylight/sunlight report, would provide poor quality	A1 (Managing the impact of development)	As demonstrated within the DAS, there will be no overlooking between the flats within the proposals itself. A comprehensive Daylight, Sunlight and Overshadowing

Refusal No.	Reason for Refusal	Relevant Local Plan Policy	How this has been addressed / Section of this report addressing reason for refusal
	accommodation for future occupants, contrary to policy.		Report assessment has been undertaken. The assessment reviews the natural light amenity for future occupants of the proposed accommodation within the development. Additionally, the effect on the direct sunlight amenity to the proposed amenity space has been studied. Analysis of the proposed residential accommodation within the development shows all rooms will see full compliance with the BRE Report (UK Annex) daylight guidance. Sunlight amenity testing highlights the urban nature of the Site and the area intentions. See para 7.63–7.66 for more details.
5	Location, design and scale, would result in a loss of privacy to nos. 20a, 21 and 21a Brownlow Mews, to the detriment of the occupiers' amenities.	A1 (Managing the impact of development)	20a, 21 and 21a Brownlow Mews are in commercial use. Notwithstanding, an assessment of the proposed building on these buildings has been undertaken as part of the scheme development which concludes that there is no direct overlooking to residential properties. Please see para 7.67–7.68 (and the Design, Heritage and Access Statement) for more information.
6	Absence of a comprehensive and adequate daylight and sunlight impact report – it is considered likely that the development would result in a harmful loss of daylight to residential properties at no. 20a, 21 and 21a Brownlow Mews.	A1 (Managing the impact of development)	As part of the Daylight, Sunlight and Overshadowing Report a review of the neighbouring properties has been undertaken. This assessment shows that no residential dwellings neighbouring the Site, with a view of the development, will transgress the 25 degree line test discussed in the BRE Report. Therefore, further detailed daylight and sunlight assessment is not required for any neighbouring properties as there will not be any noticeable impacts. See para 7.63–7.66 for more information.

Refusal No.	Reason for Refusal	Relevant Local Plan Policy	How this has been addressed / Section of this report addressing reason for refusal
7	Absence of a basement impact assessment (or a screening and scoping exercise which demonstrates a full basement impact assessment would not be required) – failed to adequately demonstrate that the proposed basement excavation would not cause harm to neighbouring properties or the structural, ground or water conditions of the area.	A1 (Managing the impact of development) and A5 (Basements)	No basement excavation works are proposed as part of the revised scheme.
8	Absence of a legal agreement for car-free housing – likely to contribute unacceptably to parking stress and congestion in the surrounding area and fail to promote more sustainable and efficient forms of transport.	Policy T1 (Prioritising walking, cycling and public transport), T2 (Parking and Car Parking) and A1 (Managing the impact of development)	The proposal will be car free, and the Applicant would enter in to a S106 obligation to secure this requirement (see para 7.104).
9	Absence of a legal agreement securing contributions to pedestrian, cycling and environmental improvements in the area – would fail to make sufficient provision in a sustainable manner for the increased trips generated by the development thus causing a cumulative detrimental impact on the borough's transport network.	A1 (Managing the impact of development) and T1 (Prioritising walking, cycling and public transport)	Please see draft heads of terms addressing these contributions (para 7.109).
10	Absence of a legal agreement securing financial contributions towards highways works – would fail to secure adequate provision for and safety of pedestrians, cyclists and vehicles.	Policy T3 (Transport infrastructure) and A1 (Managing the impact of development)	Please see draft heads of terms addressing these contributions (para 7.109).
11	Absence of a legal agreement securing a construction management plan, construction impact bond and a financial contribution for construction	G1 (Delivery and location of growth), A1 (Managing the impact of	Please see draft heads of terms addressing these contributions (para 7.109).

Refusal No.	Reason for Refusal	Relevant Local Plan Policy	How this has been addressed / Section of this report addressing reason for refusal
	management plan monitoring – likely give rise to conflicts with other road users and be detrimental to the amenities of the area generally.	development), T3 (Transport Infrastructure), T4 (Sustainable movement of goods and materials), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality)	
12	Absence of a legal agreement securing a payment in lieu of affordable housing – would fail to maximise the Site's contribution to the supply of affordable housing in the borough.	Policy H4 (Maximising the supply of affordable Housing)	A payment in lieu of affordable housing will be secured via a S106 obligation (see para 7.109).

Source: Decision Notice for Planning Application ref. 2022/3534/P

4.0

Consultation and Engagement

4.1

This section sets out the engagement and consultation that has been undertaken by the Applicant to assist officers at LBC in their consideration of the application.

Pre-application Engagement

4.2

Formal pre-application engagement with LBC has been undertaken, including a meeting with Council Officers held on 9 November 2023. Formal written feedback was received on 2 February 2024.

4.3

The response provides clear support for the approach to the alterations to the pub, the number and quality of the residential units and the overall massing of the new building. Key comments are summarised in Table 4.1 below, which also identifies how each point has been addressed.

Table 1 Summary of pre-application response (2023/4497/PRE)

Comment	How this has been addressed
Principle of the proposed land use, including the small decrease in public house floorspace, is considered acceptable.	Noted
Replacement of the existing housing at the Site and the proposed dwelling mix is supported. However, there is a need to ensure that the pub will not impact future occupiers of the flats – e.g. through the use of double-glazed windows and alternative means of ventilation without the requirement to open windows, and sound insulation.	These measures are incorporated in the proposal. Please refer to the accompanying Energy and Sustainability Statement (prepared by Ecolytik) for further details.
Local policy requires an affordable housing contribution.	See draft heads of terms (in Section 7 of this report)
With the additional 5 sqm of internal space provided to Flat 2 on the first floor, the standard of accommodation of all four residential units proposed is considered acceptable.	Noted.
The height, mass, and bulk of the proposals is considered acceptable.	Noted
The response considers that the proposed design will positively contribute to the character and setting of the mews within the wider Conservation Area. Further details of the windows, external doors, facade material, and balustrades are requested to support any future application.	Please refer to the accompanying Design, Heritage and Access Statement.
The application needs to confirm the relocation of the existing pub plant and extract facilities, as well as the location any plant facilities for the new residential units. Siting of such plant facilities should be in sensitive locations and screened from public views.	Gas boilers are proposed for the residential units so there is no appreciable external plant for the residential. The only requirement for the pub is an extract route which would be accommodated internally and terminate at roof level behind

Comment	How this has been addressed
	the existing pitch. The flues will not be visible from street or mews level.
The application needs to ensure that noise levels from the plant do not affect the amenity of neighbouring occupiers.	Section 8 of the Noise Assessment outlines a maximum noise level for future plant. As noted above, minimal plant is required, in relation to the pub, and this will not exceed advised noise levels.
A sustainability and energy statement should be provided with any future application, outlining any reduction in carbon emissions below Part L 2013 building regulations.	An Energy and Sustainability Statement has been prepared by Ecolytik. This confirms that this will be achieved at the Site.
Provision of cycle parking is considered acceptable. As the proposals comprise a partial change of use (of the pub floorspace at first floor level to residential (C3) floorspace), highways officers have considered that the cycle parking requirement for the commercial space would not be sought given no parking is provided currently.	Noted.
Recommended S106 planning obligations: <ul style="list-style-type: none"> • Affordable Housing Contribution • Car-free development for all four flats • Construction Management Plan and Implementation Support Contribution • Impact Bond • Highways Contribution • Pedestrian, cycling and environmental improvements contribution 	Noted. See draft heads of terms in Section 7 of this report.

4.4 The response also confirmed the documents required to support the application. The list of submission documents aligns with this.

Community Consultation

4.5 Given their interest in the previous application at the Site, the Applicant sought to engage with Bloomsbury CAAC and Brownlow Mews Group prior to submission of the application. Consultation letters were issued to both groups in January 2024 (see Appendix 3).

4.6 The Applicant and project team met with Brownlow Mews Group on Tuesday 27 February. This provided the opportunity to discuss the revised proposals and answer any queries directly. Residents raised a number of issues and topics which are summarised below. A response to each of these topics and how these have been addressed within this planning application is included.

Table 2 Response to topics raised

Topic	Response
Construction Management – residents raised	The planning permission would be subject to a condition which requires the submission of a Construction Management Plan prior to the

Topic	Response
concern around how the building would be constructed and what impact this would have on the mews in terms of access, noise, disturbance and duration.	commencement of development. This would require the approval by LBC before any works could commence.
Noise, privacy and overlooking – residents on Doughty Street raised concerns about the introduction of terraces at the upper levels and the impact this would have on privacy. Concern was raised around the introduction of terraces and the noise impact this would have on the mews.	The proposed terraces are approximately 40m from the rear of the existing properties on Doughty Street. This is significantly above the minimum 18m distance between habitable rooms as defined by LBC policy. The existing pub is licensed for drinking at the ground floor level in the mews and there is an existing terrace at first floor level. The additional introduction of three terraces at the upper levels are not considered to give rise to noise impacts in the context of the existing uses. A noise assessment has been undertaken and is submitted as part of this planning application. In this context, it is considered that the introduction of terraces at the upper levels and the associated benefits they will bring to the new flats is acceptable.
Party wall – the adjoining gallery raised queries regarding the construction and how this would affect the existing party wall with the gallery.	It was discussed that this was not a planning issue and would be addressed at the appropriate time.
Water tap – the mews has been awarded the Mews in Bloom Award in 2023. Residents requested that the scheme included an outside water tap to allow residents to fill watering cans.	The Applicant confirmed that this can be accommodated within the scheme.

Source:

- 4.7 The Applicant will continue to liaise with the Brownlow Mews Group.
- 4.8 No response was received from Bloomsbury CAAC.

5.0

Proposed Development

5.1

The Proposed Development comprises the refurbishment of the existing building to provide an enhanced and refurbished pub with the creation of four new residential units at the upper levels. The residential units will be accommodated through the extension of the buildings at the 1st and 3rd floors and the creation of rear terraces at 1st-4th floor. The following uses will be provided at each level:

- 1 Basement – pub storage, kitchen associated with the pub, and male and female toilet facilities.
- 2 Ground floor – main pub facilities, circulation core to accommodation above, secure cycling parking store, refuse store, and accessible toilet.
- 3 First floor – two one bedroom, two-person flats. The property adjacent to Brownlow Mews will have access to a private roof terrace.
- 4 Second floor – One two bedroom, four-person flat with access to a private roof terrace.
- 5 Third and fourth floors – One three bedroom, six-person duplex unit. A small private balcony is accessible on the third floor and a private roof terrace is accessible from the fourth floor.

5.2

Figure 5.1 shows the proposed area schedule.

Figure 5.1 Proposed Area Schedule

Location	GIA (m ²)	Terrace Area (m ²)
Public House		
Basement	182m ²	-
Ground Floor	141m ²	-
Total Pub Area	323m²	-
Residential Common Parts		
Circulation	89.5m ²	-
Waste/Bicycle Storage	13.5m ²	-
Total	103m²	-
Residential Apartments		
First Floor		
Flat 1	50m ²	48m ²
Flat 2	55m ²	-
Second Floor		
Flat 3	88m ²	16.5m ²
Third/Fourth Floor		
Flat 4 (Duplex)	114m ²	34.5m ²
Total	307m²	99m²
Total Residential Area	410m²	99m²
Total Internal Area	733m²	
NIA:GIA (Residential)	75%	

Source: Tony Fretton Architects

-
- 5.3 No changes to the principal facade along Gray's Inn Road are proposed. Along Brownlow Mews, a simple brick facade with fenestrated openings to match adjacent warehouse buildings is proposed. Access to proposed accommodation on upper levels will be achieved through an existing entrance on Brownlow Mews and new openings to a refuse store are proposed to match existing door openings.
- 5.4 The rear of the Site along Brownlow Mews has good access to daytime and evening light. The outlook and privacy of the existing properties on Brownlow Mews will be respected.
- 5.5 The Proposed Development seeks to mitigate any visual or physical impacts along Brownlow Mews by stepping back in plan and section as it increases in height.
- 5.6 Please refer to the Design, Heritage and Access Statement which accompanies this planning application for full details.

6.0 Planning Policy and Guidance

6.1 This section provides a summary of the planning policy relevant to the Site, including site specific designations and allocations and provides an assessment of the proposed scheme.

National Planning Policy Framework (2023)

6.2 The National Planning Policy Framework (NPPF) (December 2023) sets out the Government's planning policies for England. It is a material planning consideration in decision making. The NPPF requires Local Planning Authorities to adopt a positive approach to decision taking and to apply a presumption in favour of sustainable development.

6.3 The National Planning Policy Framework (NPPF) (July 2021) sets out the Government's planning policies for England. It is a material planning consideration in decision making. The NPPF requires Local Planning Authorities to adopt a positive approach to decision taking and to apply a presumption in favour of sustainable development.

6.4 Paragraph 11 of the NPPF requires Local Planning Authorities to apply a presumption in favour of sustainable development, and to approve sustainable developments without delay. It states *"For decision-taking this means:*

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

i the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole...."

6.5 Paragraph 60 supports the objective of significantly boosting the supply of homes and for sufficient and varied land to come forward where it is needed.

6.6 Paragraph 70 promotes the development of small and medium sized sites and recognises the contribution they can make to meeting housing requirements in an area.

6.7 Paragraph 126 supports the creation of high quality, beautiful and sustainable buildings and places, and states that *"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"*.

Statutory Development Plan

6.8 The statutory development plan for the Site comprises:

- 1 The London Plan (Adopted 2021);
- 2 Camden Local Plan (adopted 2017); and
- 3 Camden Site Allocations Plan (Adopted 2013).

6.9 LBC is currently reviewing and updating its local plan to cover the period up to 2040. LBC published its Regulation 18 Local Plan for consultation January 2024. The consultation is open until 13 March 2024. While it is a relevant material consideration, the draft local plan is at an early stage. Therefore, it should be afforded limited weight in decision making.

The London Plan (2021)

6.10 The London Plan (2021) sets out the spatial development strategy for Greater London. The following policies are of relevance to the proposal:

- Policy GG2 Making the Best use of Land: seeks to create sustainable and mixed-use places that enables the development of brownfields land.
- Policy GG4 Delivering the Homes Londoners Need: seeks to create a housing market that works better for all Londoners, including ensuring that more homes are delivered on a range of sites to deliver housing locally;
- Policy D2 Infrastructure Requirements for Sustainable Densities: states that the density of development proposals should be proportionate to the site's connectivity and accessibility;
- Policy D3 Optimising Site Capacity Through the Design Led Approach: requires all development to make the best use of land by following a design led approach that optimises the capacity of sites;
- Policy D4 Delivering Good Design: Outlines objective to ensure high quality design and place-making in development. Requires proposal to demonstrate how design quality will be maintained through to completion.
- Policy D5 Inclusive Design: seeks to ensure that development proposals achieve the highest standards of accessible and inclusive design;
- Policy D6 Housing Quality and Standards: requires housing development to be of high quality design;
- Policy D14 Noise: requires proposals to avoid significant adverse noise impacts on health and quality of life;
- Policy H1 Increasing Housing Supply: seeks to ensure that the ten-year targets for net housing completions are planned for and requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites;
- Policy H2 Small Sites: sets out that boroughs should pro-actively support well-designed homes on small sites (below 0.25ha in size) through planning decisions in order to significantly increase the contribution of small sites to meeting London's housing needs;
- Policy H10 Housing Size Mix: seeks to ensure that schemes consist of an appropriate range of unit sizes;
- Policy HC1 Heritage Conservation and Growth: relates to below and above ground heritage assets and requires development to preserve and enhance the significance and setting of heritage assets;

-
- Policy HC7 Protecting Public Houses: outlines measures that should be implemented to protect public houses across London;
 - Policy SI1 Improving Air Quality: requires development to be at least air quality neutral;
 - Policy SI4 Managing Heat Risk: outlines that development proposals to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
 - Policy SI7 Reducing waste and supporting the circular economy seeks that developments are designed with adequate, flexible and easily collectable waste storage space;
 - Policy SI13 Sustainable Drainage: states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible;
 - Policy T5 Cycling: sets out minimum cycle parking standards for new development and seeks to encourage cycling;
 - Policy T6 and T6.1 Car Parking: sets out maximum car parking standards for new residential development; and,
 - Policy T7 Deliveries, Servicing and Construction: notes that development proposals should facilitate safe, clean and efficient deliveries and servicing.

Camden Local Plan (2017)

6.11 The Camden Local Plan was adopted by LBC in July 2017. It sets out LBC's strategy and vision for development across the borough up to 2031. The following policies are relevant to the Site:

- Policy G1 – Delivery and location of growth
- Policy H1 – Maximising housing supply
- Policy H2 – Maximising the supply of self-contained housing from mixed-use schemes
- Policy H4 – Maximising the supply of affordable housing
- Policy H7 – Large and small homes
- Policy C4 – Public houses
- Policy A1 – Managing the impact of development
- Policy A4 – Noise and Vibration
- Policy D1 – Design
- Policy D2 – Heritage
- Policy CC1 – Climate change mitigation
- Policy CC2 – Adapting to climate change
- Policy CC4 – Air Quality
- Policy CC5 – Waste
- Policy T1 – Prioritising walking, cycling and public transport

- Policy T2 – Parking and car-free development

Planning Policy Allocations

6.12 The Site is the subject of the following site specific designations within the adopted Proposals Map of the Local plan:

- 1 Bloomsbury Conservation Area (Sub Area 10)
- 2 Archaeological Priority Area - London Suburbs, 2
- 3 Central London Area (CLA)

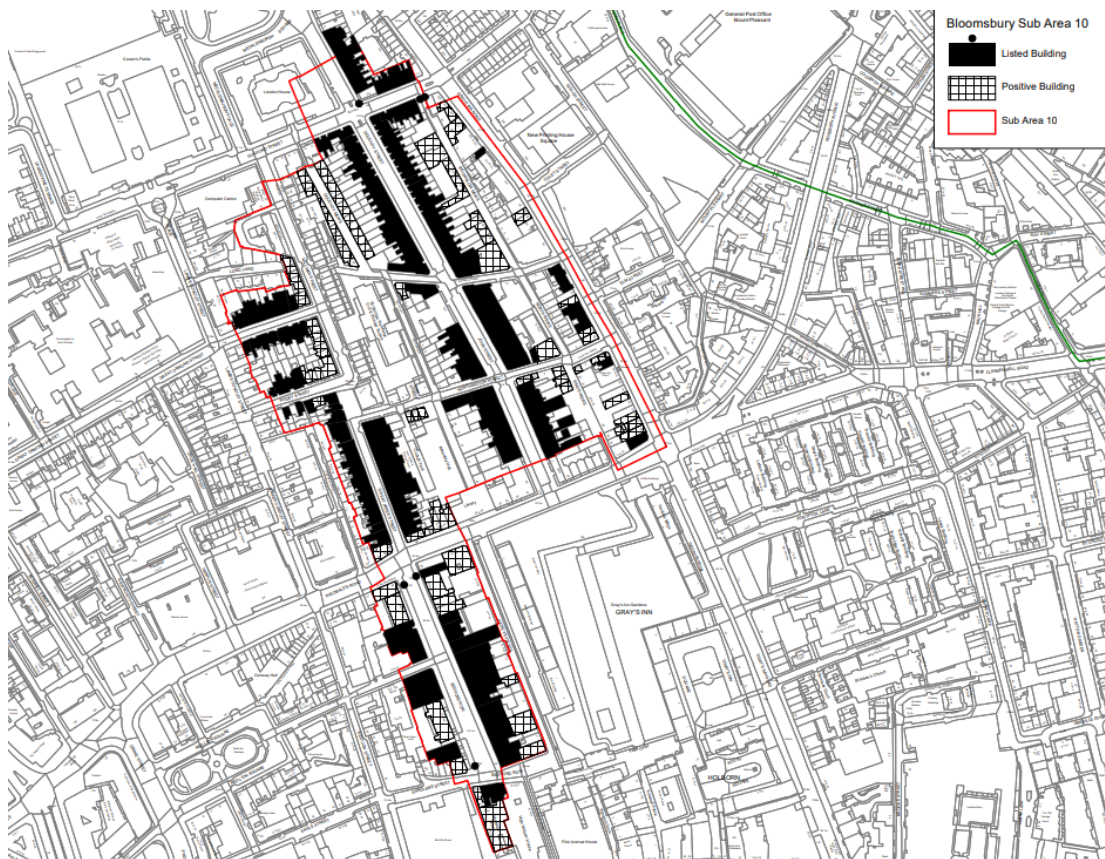
6.13 The Site is approximately 10m to the west of the Blackheath Point to St Paul's Cathedral View 6A.1 of the London View Management Framework (LVMF). However, this will not impact the proposed redevelopment.

Bloomsbury Conservation area

6.14 Bloomsbury Conservation Area was designated in 1968. It is a large conservation area, covering approximately 160 hectares, and extends from Euston Road in the north to High Holborn/ Lincoln's Inn Fields/ Carey Street in the south, and from Tottenham Court Road in the west to Gray's Inn Road/ King's Cross Road in the east.

6.15 The Site is located within Sub Area 10: Great James Street/Bedford Row (see Figure 5.1).

Figure 6.1 Bloomsbury Conservation Area - Sub Area 10



Source: LBC's Bloomsbury Conservation Area – Sub Area 10 Townscape Appraisal

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- 6.16 The Bloomsbury Conservation Area Appraisal and Management Strategy was adopted on 18th April 2011. It outlines that Bloomsbury is widely considered to be an internationally significant example of town planning. The statement describes the quintessential character of the conservation area which derives from the grid of streets enclosed by mainly three and four storey development. It has a distinctly urban character of broad streets interspersed by formal squares which provide landscape dominated focal points.
- 6.17 Sub Area 10 was developed during the Georgian and Regency periods under various ownership. The area has a clear street hierarchy structured on a grid layout. The historic built form comprises townhouses built in long terraces with rear mews. The appraisal outlines that this fine grain remains an important characteristic and the continuous building frontage created by the terraces creates a strong sense of enclosure.
- 6.18 The Blue Lion is identified as a positive building which contributes to the character and appearance of the area, with a shopfront of merit. With its single storey frontage onto Brownlow Mews and building line following the footprint of the neighbouring mews buildings, the application site forms part of the distinctive character of the mews. It is this character, scale, footprint and architectural detailing that makes a contribution to the character and appearance of this part of the conservation area.

Other Material Considerations

- 6.19 Other material considerations include guidance associated with the London Plan. These are set out below.

GLA Housing SPG (2016)

- 6.20 The Housing SPG sets out guidance to supplement the housing policies contained in the London Plan. In particular, it provides updated guidance on a range of strategic policies including housing supply, residential density, housing standards, build to rent developments, student accommodation and viability appraisals.
- 6.21 The Character and Context SPG provides guidance on the implementation of London Plan so that change is brought about in a way which is responsive to individual places and locations.

GLA Character and Context SPG (2014)

- 6.22 The Character and Context SPG provides guidance on the implementation of London Plan so that change is brought about in a way which is responsive to individual places and locations.

Camden Planning Guidance – Community Uses, Leisure and Pubs (2021)

- 6.23 Sets out guidance of how LBC will protect and enhance community, cultural, leisure and pub provision in the borough.

1 Camden’s Energy Efficiency and Adaptation CPG (2021).

7.0 Planning Assessment

- 7.1 The following sections assess the Proposed Development against the relevant policies in the Development Plan having regard to other material considerations, as set out in the previous section.

Key Planning Considerations

- 7.2 The following provides a summary of the key planning policy issues relevant to the Proposed Development. The key planning issues relate to:

- 1 Land Use
- 2 Dwelling Mix
- 3 Affordable Housing;
- 4 Standard of Accommodation;
- 5 Design, massing and historic environment;
- 6 Residential Amenity;
- 7 Sustainability;
- 8 Air Quality;
- 9 Noise;
- 10 Transport;
- 11 Waste/Refuse and Recycling; and
- 12 Planning Obligations.

Land Use

Retention of the Site as a Public House

Summary of Key Policy Objectives and Themes

- 7.3 Policy HC7 of the London Plan outlines measures that should be implemented to protect public houses across London. It also highlights that development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the public house that would compromise the operation or viability of the public house use should be resisted.

- 7.4 The Local Plan identifies that pubs play an important community and cultural role. Policy C4 'Public houses' states:

"The Council will seek to protect public houses which are of community, heritage or townscape value.

The Council will not grant planning permission for proposals for the change of use, redevelopment and/or demolition of a public house unless it is demonstrated to the Council's satisfaction that:

a. the proposal would not result in the loss of pubs which are valued by the community (including protected groups) unless there are equivalent premises available capable of meeting the community's needs served by the public house; or

b. there is no interest in the continued use of the property or site as a public house and no reasonable prospect of a public house being able to trade from the premises over the medium term;"

7.5 Policy C4 goes on to state:

"Applications involving the loss of pub floorspace, including facilities ancillary to the operation of the public house, will be resisted where this will adversely affect the operation of the public house." (emphasis added)

7.6 On the basis that the proposals will not result in the loss of the existing pub and proposes a refurbishment of the pub as part of the wider building, the key policy test, as set out in Policy C4, is that the changes to the pub will not adversely affect its operation.

Assessment

7.7 The existing pub is located on the basement, ground and first floor levels of the existing building. The visitor facing floorspace of the pub is located on the ground floor, alongside toilet facilities. The kitchen associated with the pub takes up the rear of the first floor level. The basement level mirrors the ground floor, which is not typical, and is associated with the pub. A small proportion of the space is used as a cellar and barrel storage with the remainder of the basement space being used for ancillary long-term storage, predominantly by the residential uses at the upper levels.

7.8 The proposals seek to reconfigure the existing layout to make better use of the space available and improve and optimise the operation of the pub while enabling the creation of improved residential facilities at the upper levels.

7.9 It is proposed that the kitchen of the pub is relocated from the first floor to the basement to utilise the reduced quality of this space and make better use of the area which is currently used as ancillary domestic storage. The male and female toilets, which are currently located on the ground floor, will also be moved to the basement. The current cellar and barrel space will be retained and better defined as part of the new layout. No structural alterations to the basement level would be required as part of the proposals.

7.10 The layout of the pub at ground floor level will predominantly be retained, with some space given to the introduction of a new core, refuse and cycle facilities associated with the residential units. An accessible toilet will also be retained at this level.

7.11 The entire pub will be refurbished and enhanced as part of the proposals.

7.12 The new layout will enable the pub to continue to operate in the same way as is currently the case. Due to the relocation of the kitchen and the introduction of the core and facilities at the ground floor level, the proposals will result in a small reduction of overall floorspace. Figure 7.1 provides a summary of the existing and proposed pub floorspace.

7.13 As set out above, the new layout of the pub will not adversely affect the operation of the existing business. Indeed, the refurbishment and reconfiguration of the kitchen within the basement and a designated cellar and barrel space will provide an overall benefit.

7.14 The Proposed Development ensures that sufficient ancillary facilities, which support the operation and viability of the pub, are provided in locations which are more appropriate. In particular, the pub kitchen will be located much further from the residential units, minimising the impact of the pub on residential units at the Site with regards to noise, fumes and disturbance.

7.15 The previous application proposed a loss of over 300 sqm of pub space. In particular, there was a considerable reduction at ground floor level and a large proportion of the seating space was to be relocated to the basement which does not benefit from natural light and has poor floor to ceiling heights. The revised proposal retains and maximises the use of the ground floor for seating and proposes ancillary facilities are located within the basement.

Figure 7.1 Public Houses Area Schedules

Level	Existing Pub	Proposed Pub
Ground Floor Area	178m ²	141m ²
First Floor Area	26m ²	-
Basement Area	182m ²	182m ²
Total	386m²	323m²
Net Loss	63m²	

Source: Tony Fretton Architects

7.16 LBC's Camden Planning Guidance on 'Community uses, leisure and pubs' requires applicants to undertake a community survey and an assessment of alternative pub provision in the locality when two or more elements of an existing public house would be lost through a proposed scheme. The proposals retain the toilets, kitchen and storage facilities. Therefore, a community survey and assessment of alternative pub provision in the locality is not required in this instance.

7.17 As demonstrated above, the proposals result in a minor loss of pub floorspace which will not impact on the operation or viability of the pub. Officers have confirmed during pre-application discussions that this minor reduction is acceptable. The revised layout of ancillary accommodation, particularly relocating the kitchen to basement level, optimises the floorspace at the Site and will also minimise any impact of the pub on the residential accommodation. Therefore, the Proposed Development complies with Policy C4 of the Local Plan.

Creation of New Residential (Class C3) floorspace

Summary of Key Policy Objectives and Themes

- 7.18 London Plan Policy H1 requires boroughs to optimise the potential for housing delivery on brownfield sites through their planning decisions. London Plan Policy H2 encourages well-designed homes on small sites (below 0.25ha in size) to significantly increase the contribution of small sites to meeting London's housing needs.
- 7.19 London Plan Policy H10 states that schemes should generally consist of a range of unit sizes, decided with regard to factors such as evidence of local need, the nature and location of the site, the aim to optimise housing potential on sites, the need for additional family housing and the role of one and two bed units in freeing up existing housing.
- 7.20 In principle, LBC seeks to '*maximise the supply of housing*' within the borough (Local Plan Policy H1).
- 7.21 Local Plan Policy H2 relates to self-contained housing from mixed use schemes. Where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses. As the Site is within the CLA, development involving more than 200 sqm (GIA) of additional floorspace is required to provide 50% of the additional floorspace as self-contained housing.

Assessment

- 7.22 The existing building contains residential accommodation at the upper levels. However, this accommodation is poor quality and in need of refurbishment. The proposals seek to provide new, high quality residential accommodation that will meet both national and local standards and LBC's strategic and detailed policy objectives.
- 7.23 The principle of housing at the Site for the private market is supported in policy which seeks to maximise the provision of residential use within the borough. It is considered that additional residential units can be provided at the Site, which is already partially in residential use, without any associated adverse impacts to the operation of the pub or surrounding uses.
- 7.24 The proposals comprise a gross floorspace gain of 241 sqm (GIA). However, the proposals comprise a partial change of use (of the pub floorspace at first floor level to residential (C3) floorspace) which will result in a corresponding floorspace loss of 63 sqm (GIA). Therefore, the net floorspace uplift will equate to 178 sqm (GIA). The proposals do not exceed the floorspace threshold set out in Policy H2 of the Local Plan. Notwithstanding this, all of the new floorspace proposed will accommodate the self-contained housing units.
- 7.25 It is noted that officers raised concerns about the previous application at the Site in terms of the loss on ancillary residential accommodation for the pub owner. However, while one of the existing residential units is being occupied by the manager of the pub, this was a decision taken when the current lease of the pub was agreed. The existing pub owners have given notice and will be vacating the Site at the end of the current lease (March 2024) at which point the residential units may be rented separately to the pub floorspace. This is a self-contained flat which can be independently occupied when the current lease ends. On this basis, the current proposals will not impact on the viability of the pub.

Dwelling Mix

Summary of Key Policy Objectives and Themes

- 7.26 Local Plan Policy H7 requires that all housing developments, including the conversion of existing homes and non-residential properties should contribute to the priorities set out within the Dwelling Size Priorities Table (Figure 7.2) and includes a mix of large and small homes.

Figure 7.2 Dwelling Size Priorities Table Referenced in Policy H7

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

Source: The London Borough of Camden Local Plan (adopted 2017)

Assessment

- 7.27 The Proposed Development will create four self-contained residential units as follows:
- No. 2 x one bed units.
 - No. 1 x two bed unit.
 - No. 1 x three bed unit.

- 7.28 The proposals provide a range and mix of units which is not typical for a scheme of this scale and in this location. 50% of the units proposed are two or three bed properties. Local Plan Policy H7 identifies that two and three bed market units are a high priority. Given two/three bed units comprises a large proportion of the proposals, the scheme accords with Policy H7.

Affordable Housing

Summary of Key Policy Objectives and Themes

- 7.29 Local Plan Policy H4 seeks to maximise the supply of affordable housing in the borough. An affordable housing contribution is expected from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 sqm GIA or more. Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing.

Assessment

- 7.30 In accordance with Local Plan Policy H4, a payment in lieu of affordable housing will be secured via a S106 obligation. See para 7.103 of this report for draft heads of terms.

Standard of Accommodation

Summary of Key Policy Objectives and Themes

- 7.31 London Plan Policy D6 and Local Plan Policy H6 requires developments to meet nationally described space standards. London Plan Policy D6 also outlines that developments should maximise provision of dual aspect dwellings and avoid the provision of single aspect dwellings, where possible.
- 7.32 London Plan Policy D7 requires that at least 10% of dwellings in a proposal meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and that all other dwellings meet requirement M4(2) 'accessible and adaptable dwellings'.
- 7.33 All homes and shared areas, internal and external, will be fully accessible and will comply with required Building Regulations.
- 7.34 Local Plan Policy H6 requires 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2). It also requires 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).

Assessment

- 7.35 The Design, Heritage and Access Statement accompanying the planning application, and the planning drawings demonstrate that all the proposed dwellings will meet or exceed the minimum space standards.
- 7.36 The one-bedroom units on the first floor are each single aspect, with Flat 1 facing west and Flat 2 facing east. As demonstrated in the accompanying Daylight and Sunlight Assessment, both units will receive sufficient daylight and sunlight throughout the year.
- 7.37 Units 1, 3, and 4 each feature large private roof terraces, facing west. Although Flat 2 does not feature private outdoor amenity space, an additional 5 sqm of internal floor area compensates for the lack of outdoor amenity space. Furthermore, provision of external amenity space to Flat 2 would be at the expense of retaining the existing, historic façade of the building fronting Gray's Inn Road. Therefore, on balance, the additional internal space was considered to be the best option.
- 7.38 The scheme does not trigger the requirement for M4(3) dwellings ('0.4 of a dwelling'). Units 1, 2 and 4 are built to M4(2) and Unit 3 is built to M4(3)(2a).

Design, Massing and Historic Environment

Summary of Key Policy Objectives and Themes

- 7.39 Policy at all levels requires high quality design and protection of amenity. Paragraph 126 supports the creation of high quality, beautiful and sustainable buildings and places, and states that "*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*".

-
- 7.40 London Plan Policy D3 sets out how development should make the best use of land by following a design-led approach that optimises the capacity of sites, ensuring that development is of the most appropriate form and land use for the site.
- 7.41 London Plan Policy D4 outlines objectives to ensure high quality design and place-making in development. London Plan Policy D5 seeks to ensure that development proposals achieve the highest standards of accessible and inclusive design.
- 7.42 London Plan Policy HC1 Heritage Conservation and Growth relates to below and above ground heritage assets and requires development to preserve and enhance the significance and setting of heritage assets.
- 7.43 Policy D1 of the Local Plan states that *‘the Council will seek to secure high quality design in development.’* The policy goes on to state that the following will be required which are relevant to the redevelopment of the Site:
- “respects local context and character;*
- preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
- is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- comprises details and materials that are of high quality and complement the local character;*
- is inclusive and accessible for all;*
- is secure and designed to minimise crime and antisocial behaviour;*
- incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- incorporates outdoor amenity space; and*
- for housing, provides a high standard of accommodation.”*
- 7.44 Any schemes which do not meet the above objectives will be resisted.
- 7.45 Policy D2 requires developments to conserve and, where appropriate, enhance the borough’s heritage assets and their settings, including both listed buildings and conservation areas. To maintain the character of Camden’s conservation areas, LBC will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. LBC will:
- 1 *“Require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
 - 2 *Resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
 - 3 *Resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*

-
- 4 *Preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.”*

7.46 The supporting text to the policy advises that LBC will resist the total or substantial demolition of buildings which make a positive contribution to a conservation area unless circumstances are shown that outweigh the case for retention. Furthermore, it outlines that changes in patterns of use can also erode the character of an area. It considers pubs to be of particular importance to the character of conservation areas. LBC will protect this use in accordance with Policy C4.

7.47 With regards to archaeology, LBC will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Assessment

7.48 The Applicant recognises that the Site is sensitive in heritage terms due to its location within Bloomsbury Conservation Area and an area of archaeological priority. Several listed heritage assets are also within 60m of the Site.

7.49 The scheme that was refused planning permission in 2022 was significantly larger in size than the existing building and involved extensions to the rear at all levels with a fifth floor also added. It also involved both raising the ridge line along Gray’s Inn Road, which impacted the primary façade, and proposed excavating extra space in the basement.

7.50 When compared with the previous application at the Site, the revised proposals are modest in scale and the profile of the building steps back from Brownlow Mews when stepping up the floor levels. The building line to the rear of the proposals accords with the adjoining buildings which project further than the existing massing on the Site.

7.51 The proposed fourth floor is accommodated within existing roof space. The existing facade along Gray’s Inn Road remains untouched and there is no increase in the height of the overall building, maintaining the primary facade. This ensures that the impact of the Proposed Development on the surrounding heritage assets is minimised as it does not protrude above existing building lines.

7.52 The material palette has evolved from a careful analysis of the surrounding context and proposes materials that are comparable to the existing fabric and sympathetic in nature to neighbouring buildings.

7.53 The pub facade at ground floor level along Brownlow Mews remains largely unchanged, with one window restored to match the unaltered existing windows. A new opening to the refuse store is also proposed to match the existing door opening to the pub. London stock-type brick is proposed for the upper levels along this facade to replicate the existing fabric and to match neighbouring buildings along the mews. Openings are sized to match the proportions of those in adjacent warehouse buildings and will have dark-coloured frames along with the proposed railings to terraces.

7.54 Proposed door and window lintels are defined by soldier courses; window sills and building copings are simply expressed; and ‘The Blue Lion’ signage is also retained along Brownlow Mews.

7.55 As demonstrated above, the scheme aligns with Local Plan Policy D1, D2 and C4.

Residential Amenity

Summary of Key Policy Objectives and Themes

7.56 London Plan Policy D6 requires a minimum of five square meters of private outdoor space should be provided for 1-2 person dwellings and an extra 1.sq.m should be provided for each additional occupant, achieving a minimum depth and width of 1.5m.

7.57 Local Plan Policy A1 ‘Managing the Impact of Development’ sets of the policy tests against which schemes will be assessed and states:

“The Council will seek to protect the quality of life of occupiers and neighbours.

We will grant permission for development unless this causes unacceptable harm to amenity.

We will:

a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;

b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;

c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and

d. require mitigation measures where necessary.

The factors we will consider include:

- visual privacy, outlook;*
- sunlight, daylight and overshadowing;*
- noise and vibration levels;*
- odour, fumes and dust”;*

Assessment

7.58 Residential amenity and the impact of the development on surrounding properties was a key determining factor of the previous application.

7.59 As noted above, units 1, 3, and 4 feature large private roof terraces, facing west. Each terrace has a width greater than 1.5 sqm and the areas are as follows:

- Unit 1 – 48 sqm*
- Unit 3 – 16.5 sqm*

-
- Unit 4 – 34.5 sqm

7.60 As demonstrated above, the private terraces exceed national policy requirements.

7.61 Although Flat 2 does not feature private outdoor amenity space, an additional 5 sqm of internal floor area compensates for the lack of outdoor amenity space. In its pre-app response, LBC confirmed that this approach ensured that the standard of accommodation of all four residential units proposed was acceptable.

7.62 Odour and fumes from the pub kitchen would be vented at roof level (as per the existing arrangement).

Daylight Sunlight

7.63 A detailed Daylight, Sunlight and Overshadowing (DSO) assessment has been undertaken, by Lichfields. The assessment reviews the natural light amenity for future occupants of the proposed accommodation within the development. Additionally, the effect on the direct sunlight amenity to the proposed amenity space has been studied.

7.64 A review of the neighbouring properties indicates that there are residential properties within the vicinity of the Site. However, initial testing proves no residential dwellings neighbouring the Site, with a view of the development, will transgress the 25 degree line test discussed in the BRE Report (see drawings DSO601 and DSO602 in Appendix 4 of the DSO). Therefore, a daylight and sunlight assessment is not required for any neighbouring properties.

7.65 Analysis of the proposed residential accommodation shows that daylight and sunlight amenity is appropriate for this type of development with all rooms seeing full compliance with the BRE Report (UK Annex) daylight guidance. As with most urban sites of this nature, direct sunlight amenity within some rooms will be limited. Given the character and form of the property and its urban location, the daylight and sunlight amenity of the Proposed Development is considered to be in line with urban expectations. The overshadow study shows the proposed terraced amenity spaces will see full compliance with the BRE Report guidelines.

7.66 Analysis of the proposed residential accommodation within the development shows some minor deviation from the daylight and sunlight guidelines. However, the majority of all rooms will see full compliance with the BRE Report (daylight UK Annex) daylight guidance. Sunlight amenity testing highlights the urban nature of the Site and the area intentions. As with most urban sites of this nature direct sunlight amenity within some rooms will be limited. The overshadow study shows the proposed terraced amenity spaces will see full compliance with the BRE Report guidelines.

Privacy and Overlooking

7.67 In terms of privacy and overlooking, the buildings directly opposite the Site on Brownlow Mews are primarily offices and workplace buildings. Figure 7.4 provides a plan of the Site and surrounding context and includes the distances from the proposed residential balconies/terraces to the nearest residential properties. There is no direct overlooking to residential properties and the shortest distance from an upper floor terrace to a neighbouring residential property is approximately 15.3m. It should be noted however, that

this distance is measured from an existing first floor residential terrace associated with the apartments over the pub. The remaining distances to neighbouring residential properties range from 20.8m up to 33m, with many of the views being obscured by surrounding buildings.

7.68

As demonstrated within the DAS, there will be no overlooking between the flats within the proposals itself.

Figure 7.3 Site Lines/Visibility Angles in Relation to Surrounding Properties



Source: Tony Fretton Architects

7.69

Given the above, the proposals comply with the requirements of the London Plan and Local Plan Policy A1.

Sustainability

Summary of Key Policy Objectives and Themes

7.70

Local Policy CC1 requires all developments 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. In particular, part e. of Policy CC1 states that all proposals involving substantial demolition must demonstrate that it is not possible to retain and improve the existing building. Part c. of Policy CC1 states the location of development and mix of land uses should minimise the need to travel by car.

Policy CC2 requires all development to adopt appropriate climate change adaptation measures.

Assessment

7.71 While the previous application involved substantial demolition, the proposed scheme makes use of the existing structure and massing on the Site. The proposals involve only minor alterations to the first and second floor facades on the Brownlow Mews side of the building (as shown in Figure 7.3) while retaining the pub facade on the ground floor and the existing floorplates. The entire façade along Gray's Inn Road is retained as part of the proposed scheme and the structure of the pub at ground and basement level will be retained.

Figure 7.4 Section of Building (proposed demolition shown in red)



Source: Tony Fretton Architects

7.72 An Energy and Sustainability Statement has been prepared by Ecolytik, in accordance with the London Plan and Camden's Local Plan.

7.73 Through the measures outlined for each stage of the Energy Hierarchy, it is anticipated the proposed new homes can achieve a 53% reduction in regulated CO2 emissions over the existing building baseline and a 10% reduction over the GLA's Appendix 3 or Part L 2021 baseline.

7.74 The reductions have been maximised as far as possible given site and building specific constraints, which meets GLA and Camden's energy policies for minor refurbishment and extension developments.

7.75 Numerous sustainability measures have been integrated into the scheme, including:

- The proposed retention, refurbishment and extension scheme will have notably lower Whole Life Carbon impact than an equivalent demolition and new build development.

- Existing building fabric and systems will be upgraded as part of a fabric first approach to minimise energy demand.
- New fabric elements will go beyond Part L 2021 targets.
- Reuse of existing building structure and fabric will significantly reduce waste generation compared to a fully new build scheme.
- Materials will be responsibly sourced where feasible.
- Construction and demolition waste will be limited through reduction/reuse/recycling measures.
- Site is not at risk of flooding and will not increase flood risk elsewhere.
- Windows will be double glazed and openable for purge ventilation. MVHR with boost and partial air tempering module can be implemented to reduce overheating risk where required.

7.76 The Site has a PTAL rating of 6b representing the highest level of access to public transport services. Given the Site's highly sustainable location, future occupants of the residential units and pub customers can easily access the Site via public transport.

7.77 Through the adoption of the energy and sustainability strategies presented in Ecolytiks report, the Applicant has demonstrated that the Proposed Development would fulfil the relevant policy requirements stipulated by the London Plan, and by Camden Council within their Local Plan. The proposal will positively contribute to sustainable development at the Site and its surroundings.

7.78 On this basis, the proposals comply with Local Plan Policy CC1.

Air Quality

Summary of Key Policy Objectives and Themes

7.79 Local Plan Policy CC4 states that the Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan.

7.80 The action plan highlights that the entire borough has been defined as an Air Quality Management Area (AQMA) since 2002 to address nitrogen dioxide (NO₂) and particulate matter (PM₁₀) pollution.

Assessment

7.81 An Air Quality Assessment has been prepared by Syntegra. The report determines baseline air quality conditions at the Site, considers its suitability for the proposed end-use and assesses potential effects associated with the scheme.

7.82 In line with the GLA's SPG on The Control of Dust and Emissions during Construction and Demolition, any potential dust and stationary plant emissions during the construction period, and any potential impact from traffic flows on the local road network, during and after construction will be mitigated.

-
- 7.83 The Proposed Development is car free, with no anticipated transport emissions during operation.
- 7.84 Heating and hot water will be provided to all dwellings via ultra-low-NO_x gas boilers with NO_x emission of less than 40 mg/kWh.
- 7.85 The Air Quality Assessment undertaken for the Site indicates that the scheme will be air quality neutral.
- 7.86 Results from dispersion modelling undertaken to predict pollutant concentrations from the local highway network, verified using local monitoring data, shows that air quality objectives are exceeded at First and Second floors of the development. Mitigation measures including MVHR with NO_x/NO_x filtration or with air intake from above Second floor level will be in place to ensure future occupants are not exposed to elevated pollutant levels.
- 7.87 Overall, it has been demonstrated that the Proposed Development will not give rise to any significant effects with regards to air quality. On this basis, it can be concluded that the Proposed Development aligns with Local Plan Policy CC4.

Noise

Summary of Key Policy Objectives and Themes

- 7.88 London Plan Policy D14 requires proposals to avoid significant adverse noise impacts on health and quality of life.
- 7.89 Local Plan Policy A4 outlines that development should have regard to Camden's Noise and Vibration Thresholds (Appendix 3). Planning permission will not be granted for:
- a development likely to generate unacceptable noise and vibration impacts; or
 - b development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

Assessment

- 7.90 A Noise Impact Assessment has been prepared by Syntegra Consulting and submitted with this application. The assessment reviews the existing noise climate at the Site and the impact of this on the Proposed Development. The assessment is based on the results of a noise measurement survey that has been carried out over a 4-day period at the Site and has considered the advice of local and national planning policy and best practice guidance. In accordance with Policy A4, the assessment identifies that the most appropriate noise criteria in respect of the proposals, are set out in Table B of Appendix 3.
- 7.91 The assessment identified that LBC's requirements in respect of internal noise levels can be achieved through careful consideration of the building envelope. The construction assumptions that have led to this conclusion are:
- 1 The façade build-up will be a standard brick and block construction (or equivalent) to achieve an R_w of approximately 55 dB.
 - 2 At the front of the Site:

-
- a A typical double-glazing system in a 6/16/6.8 (with acoustic laminate) configuration (or equivalent) will be installed to give a Sound Reduction Index (SRI) of 38 dB R_w.
 - b An alternative means of ventilation, such as MVHR or appropriately specified acoustic vents, with a D_{n,e,w} of at least 44 dB, will be installed to allow adequate ventilation without the requirement to open windows.
- 3 At the rear of the Site:
 - a A typical double-glazing system in a 4/12/6 configuration (or equivalent) will be installed to give a Sound Reduction Index (SRI) of 30 dB R_w.
 - b Appropriately specified acoustic trickle vents, with a D_{n,e,w} of at least 36 dB, or an alternative means of ventilation will be installed to allow adequate ventilation without the requirement to open windows.
 - 4 Purge ventilation (as defined by ADF) through open windows.
 - 5 Mitigation of overheating (where required) through means other than open windows.

7.92 The assessment also concluded that the external noise level criteria would be achieved within the proposed amenity areas.

7.93 It is noted that the pre-application response outlined that this planning application needs to ensure that noise levels from the plant do not affect the amenity of neighbouring occupiers. Gas boilers are proposed for the residential units so there is no appreciable external plant for the residential. With regards to the pub, the only requirement is an extract route which would be accommodated internally at future design stages and terminate at roof level behind the existing pitch. Therefore, it would not be visible from street or mews level.

7.94 Section 8 of the Noise Assessment, a maximum noise level for future plant installations. As demonstrated above, minimal plant is required, in relation to the pub, and this will not exceed advised noise levels.

7.95 Outline advice has been provided to ensure that sufficient sound insulation is provided between the ground floor public house and first floor flats. During the detailed design stage, a detailed sound insulation assessment will be carried out to ensure that a sufficient level of sound insulation will be achieved and ensure adverse impacts are avoided. This will be secured via a planning condition.

7.96 Overall, it has been demonstrated that through careful consideration of the building envelope construction, plant noise and internal sound insulation, the Proposed Development will avoid future residents being exposed to harmful levels of noise. On this basis, it can be concluded that significant adverse impacts on the health or quality of life of those future residents would be avoided, in line with the aims of the NPPF and Local Plan Policy A4.

Transport

Summary of Key Policy Objectives and Themes

- 7.97 London Plan Policy T6.1 sets out the maximum standards for residential car parking. Given the Site's central location and high PTAL rating, all residential development should be car free. This is echoed in Policy T2 of the Local Plan which advises that new developments are expected to be car free.
- 7.98 Policy T1 requires new developments to provide cycle parking in accordance with the London Plan which requires long-stay cycle parking as follows:
- 1 1 cycle space for a 1 bed unit, 1 person dwelling
 - 2 1.5 spaces per 1 bed, 2 person dwelling
 - 3 2 spaces for all other dwellings.
- 7.99 For schemes below 5 dwellings, there is no additional requirement for short-stay cycle parking spaces.
- 7.100 For pub uses there is a requirement for 1 long-stay cycle parking space per 175 sqm (GEA) and 1 space per 20 sqm short-stay cycle parking spaces.
- 7.101 There are also more specific policies regarding the useability and accessibility of cycle parking in terms of location and proximity to entrances as well as the form of parking.

Assessment

- 7.102 The proposed scheme will be car free, and this will be secured via a S106 obligation (see para 7.103 for draft heads of terms). Secure cycle storage will be provided for occupants of the residential units at ground floor level. London Plan requires the following in terms of cycle parking:
- x2 1b2p units – 3 cycle parking spaces
 - x1 2b4p unit – 2 cycle parking spaces
 - x1 3b6p unit – 2 cycle parking spaces
- 7.103 Eight cycle parking spaces will be provided, adjacent to the new core proposed which exceeds London Plan policy which requires seven spaces. These will be accessed from the secure, residential entrance off Brownlow Mews.
- 7.104 The pub does not currently provide any short or long stay car parking and the proposals seek to retain the current situation. Camden's Highways officers reviewed the scheme at pre-application stage and confirmed that given the proposals comprise a partial change of use (of the pub floorspace at first floor level to residential (C3) floorspace), the cycle parking requirement for the commercial space would not be sought as no parking is provided currently.

Waste / Refuse and Recycling

Summary of Key Policy Objectives and Themes

- 7.105 Policy CC5 of the Local Plan outlines that developments must include facilities for the storage and collection of waste and recycling.

Assessment

- 7.106 As demonstrated in the Design, Heritage and Access Statement, a secure refuse store is provided at ground level, accessed directly from Brownlow Mews. The existing refuse area for the pub is located in the basement storage area and this will be retained in the Proposed Development.

Planning Obligations

- 7.107 The Applicant proposes to enter into a Legal Agreement in relation to the Proposed Development. The Heads of Terms for the legal agreement will need to be agreed by separate negotiation.
- 7.108 The NPPF sets out that planning obligations will only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development.
- 7.109 On this basis, and taking into account the Proposed Development for the Site, the draft S106 Heads of Terms are as follows:
- Car-free housing;
 - Payment in lieu of affordable housing;
 - Payment of the Council's reasonable legal and other professional costs incurred preparing and completing the Legal Agreement.

8.0 **Planning Benefits and Conclusions**

- 8.1 This Planning Statement provides a detailed assessment of the Proposed Development at The Blue Lion, Gray's Inn Road, London against national and local planning policy and guidance.
- 8.2 The development will yield a range of planning benefits, which weigh in favour of the application, including:
- 1 Retention and enhancement of an existing public house to ensure its long term viability.
 - 2 Optimisation of a brownfield site in a highly accessible and sustainable location.
 - 3 Delivery of four high-quality residential units which will contribute to meeting housing need within Camden in (net gain of 2 units).
 - 4 A Proposed Development which is sensitive to the local context and character of its immediate surroundings and is of high-quality design.
 - 5 53% reduction in regulated CO2 emissions over the existing building baseline and a 10% reduction over the GLA's Appendix 3 or Part L 2021 baseline.
 - 6 Provision of good quality cycle parking, promoting sustainable travel behaviour among residents.
- 8.3 These material planning benefits militate strongly in support of the Proposed Development.
- 8.4 Overall, the Proposed Development has been designed to directly address LBC's reasons for refusing the previous application at the Site. The Proposed Development is aligned with national and local planning policy. It has significant merit in planning terms through optimising a brownfield site.
- 8.5 In conclusion, the Proposed Development embodies the principles of sustainable development promoted through the NPPF, and will result in a number of economic, social and environmental benefits.

Appendix 1 Planning History

Table 1 summarises planning decisions for the Site as available on LB Camden's online planning records.

It is noted that the Site address is sometimes referred to as 131-133 Gray's Inn Road.

Table 1 Planning History of the Site

Reference	Development Description	Decision	Date of Decision
AC1766/A/P1	A double-sided projecting sign, lettered "The Blue Lion" in blue perspex and "Trumans" and a directional arrow in black perspex all on an opal perspex panel and internally illuminated, to be erected in Guilford Street, on the covered entrance leading to Brownlow Mews. Height 1'6", length 2'2", overall height 15'0".	Refused	12-09-1960
AC1766/B/P1	Neon border tubing to glow blue, to be affixed to the upper and two sides of the fascia. Length of fascia 34'9", height 2'6", total length of tubing 43'0" approximately and overall height 13'0". (In accordance with plan enclosed).	Approved	29-03-1962
12703	Redevelopment of the site of the Blue Lion Public House, 131-133 Gray's Inn Road, W.C.1 by the erection of a building comprising sub-basement, basement, and ground and four floors over for use as a public house with offices and self-contained flats.	Refused	11-05-1972
8600027	Alterations to Gray's Inn Road ground floor elevation ^as shown on drawings numbered 9215/01 02 11A & 12A.	Approved	26-03-1986
8680002	1. Display of a spotlight painted hanging signboard. Depth 1.2m. Projection 1.1m. Overall height 6m. ^2.Display of a set of floodlit letters on fascia with overall length of 10m and overall height of 4m. ^As shown on drawing no 9215/12E.	Approved	25-06-1986
ASX0204979	Display of halo illuminated fascia signs and externally illuminated projecting signs to Gray's Inn Road and Brownlow Mews elevations, as shown on drawing numbers: Site Location Plan, Drawing Numbers 6714 (Existing) & 6715 (Existing), 6714 (Proposed) & 6715 (Proposed) and technical specification for lighting.	Approved	26-10-2002

Reference	Development Description	Decision	Date of Decision
2003/0942/A	The display of a fascia sign to the front and rear, and a projecting sign to the rear, externally illuminated, to replace existing.	Withdrawn	
2007/2852/P	Alterations to the front of the public house (Class A4 use) including the installation of 2 awnings on either side of the entrance and the erection of wall mounted heating and lighting.	Approved	17-08-2007
2010/0936/TC	4 tables and 8 chairs on the highway in Gray's Inn Road outside The Blue Lion PH between 11:00 and 23:00 Monday to Friday. Renewal application.	Approved	01-04-2010
2010/1523/TC	4 Tables and 8 chairs from Monday - Friday 11:00 - 23:00	Registered (26-03-2010) – no decision issued	N/A
2011/0899/TC	4 tables and 8 chairs Monday to Friday: 11:00am to 11:00pm Renewal application	Approved	12-04-2011
2013/0105/TC	4 tables and 8 chairs Monday to Friday: 11:00am to 11:00pm Renewal application	Approved	06-03-2013
2014/2038/TC	2 Tables and 4 Chairs (Previously: 4 Tables and 8 Chairs) Monday to Thursday: 09:00 to 23:00, Friday to Saturday: 09:00 to 23:30 Sunday: 09:00 to 22:30 (Previously: Monday to Friday: 11:00 to 23:00) Renewal and Variation Application	Approved	28-04-2014
2022/3534/P	Partial change of use from pub (Sui Generis) and ancillary accommodation to pub (Sui Generis) and residential (C3) involving the creation of 7 residential units. Erection of three storey rear extension at 1st-3rd floor and two storey roof extension. Erection of rear terraces at 1st-5th floor and ground floor fenestration alterations	Refused	24-11-2022

Source: LB Camden's Online Planning Register

**Appendix 2 Decision Notice Application
ref. 2022/3534/P**

Application ref: 2022/3534/P
Contact: Sofie Fieldsend
Tel: 020 7974 4607
Email: Sofie.Fieldsend@camden.gov.uk
Date: 24 November 2022

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: 020 7974 4444

planning@camden.gov.uk

www.camden.gov.uk/planning

Hybrid Planning & Development
21 Vyner Street
London
E2 9DG
United Kingdom

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Full Planning Permission Refused

Address:

**133 Gray's Inn Road
London
Camden
WC1X 8TU**

Proposal:

Partial change of use from pub (Sui Generis) and ancillary accommodation to pub (Sui Generis) and residential (C3) involving the creation of 7 residential units. Erection of three storey rear extension at 1st-3rd floor and two storey roof extension. Erection of rear terraces at 1st-5th floor and ground floor fenestration alterations

Drawing Nos: 754-001; 754-010; 754-011; 754-012; 754-013; 754-014; 754-015; 754-020; 754-030; 754-031; 754-032; 754-033; 754-050; 754-051; 754-052; 754-053; 754-054; 754-055; 754-060; 754-070; 754-071; 754-072; 754-073; 754-100 Rev.P2; 754-101 Rev.P2; 754-102; 754-103; 754-104; 754-105; 754-106; 754-107; 754-110; 754-111; 754-120; 754-121 Rev.P2; 754-122 Rev.P2; 754-123 Rev.P2;

Supporting documents:

Air Quality Assessment dated April 2022 by Syntegra consulting; Energy & Sustainability Report dated 20/4/22 by Environmental economics; Noise Impact Assessment rev.B dated May 2022 by Environmental economics; Kitchen Odour Assessment dated April 2022 by Environmental economics; Daylight, Sunlight &

Overshadowing Assessment dated August 2022 by NRG Consulting; Financial Viability Assessment dated August 2022 by Town Centre Regeneration Ltd;

Fire statement dated 16/3/22 by Vemco consulting; Heritage assessment dated April 2022 by Icení and Josta 2-tier High Capacity Racks by cycle works

The Council has considered your application and decided to **refuse** planning permission for the following reason(s):

Reason(s) for Refusal

- 1 The proposed development, as a result of the loss of public house ancillary accommodation, storage space and access to outside amenity space, would adversely affect the operation of the public house, contrary to policy C4 (public houses) of the Camden Local Plan 2017.
- 2 The proposed development, as a result of the detailed design, height, scale, massing and form of the proposed extensions and alterations, and the loss of important architectural features through demolition, would cause harm to the character and appearance of the building and the Bloomsbury Conservation Area, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.
- 3 The proposed development, has failed to demonstrate that it is not possible to retain and improve the existing building, and as such has not satisfactorily justified the proposed substantial demolition, contrary to policy CC1 of the London Borough of Camden Local Plan 2017.
- 4 The proposed development, by reason of the potential overlooking between flats 01 and 02 at 1st floor and flats 04 and 05 at 3rd floor, and in absence of a comprehensive daylight/sunlight report, would provide poor quality accommodation for future occupants, contrary to policy A1 (Managing the impact of development) of the London Borough of Camden Local Plan 2017.
- 5 The proposed development, by reason of its location, design and scale, would result in a loss of privacy to nos. 20a, 21 and 21a Brownlow Mews, to the detriment of the occupiers' amenities, contrary to policy A1 (Managing the impact of development) of the London Borough of Camden Local Plan 2017.
- 6 In the absence of a comprehensive and adequate daylight and sunlight impact report to demonstrate otherwise, it is considered likely that the development would result in a harmful loss of daylight to residential properties at no. 20a, 21 and 21a Brownlow Mews, contrary to policy A1 (Managing the impact of development) of the London Borough of Camden Local Plan 2017.
- 7 In the absence of a basement impact assessment (or a screening and scoping exercise which demonstrates a full basement impact assessment would not be required), it has failed to be adequately demonstrated that the proposed basement excavation would not cause harm to neighbouring properties or the structural, ground or water conditions of the area, , contrary to policies A1 (Managing the impact of development) and A5 (Basements) of the London Borough of Camden Local Plan 2017.
- 8 The proposed development, in the absence of a legal agreement for car-free housing, would be likely to contribute unacceptably to parking stress and congestion in the surrounding area and fail to promote more sustainable and efficient forms of

transport, contrary to policies T1 (Prioritising walking, cycling and public transport), T2 (Parking and Car Parking) and A1 (Managing the impact of development) of the London Borough of Camden Local Plan 2017.

- 9 The proposed development, in the absence of a legal agreement securing contributions to pedestrian, cycling and environmental improvements in the area, would fail to make sufficient provision in a sustainable manner for the increased trips generated by the development thus causing a cumulative detrimental impact on the borough's transport network, contrary to policies A1 (Managing the impact of development) and T1 (Prioritising walking, cycling and public transport) of the London Borough of Camden Local Plan 2017.
- 10 The proposed development, in the absence of a legal agreement securing financial contributions towards highways works, would fail to secure adequate provision for and safety of pedestrians, cyclists and vehicles, contrary to policies T3 (Transport infrastructure) and A1 (Managing the impact of development) of London Borough of Camden Local Plan 2017.
- 11 The proposed development, in the absence of a legal agreement to secure a construction management plan, construction impact bond and a financial contribution for construction management plan monitoring, would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), T4 (Sustainable movement of goods and materials), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.
- 12 The proposed development, in the absence of a legal agreement securing a payment in lieu of affordable housing, would fail to maximise the site's contribution to the supply of affordable housing in the borough, contrary to policy H4 (Maximising the supply of affordable Housing) of the London Borough of Camden Local Plan 2017.

Informative(s):

- 1 Without prejudice to any future application or appeal, the applicant is advised that reasons for refusal nos. 8-12 could be overcome by entering into a Section 106 Legal Agreement for a scheme that was in all other respects acceptable.
- 2 Without prejudice to any future application or appeal, the applicant is advised that the reason for refusal no.7 could be overcome by providing a basement impact assessment (or a screening and scoping exercise which demonstrates a full basement impact assessment would not be required), in line with advice in Policy A5 and CPG 'Basements' for a scheme that was in all other respects acceptable.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraph 38 of the National Planning Policy Framework 2021.

You can find advice about your rights of appeal at:

[https://www.gov.uk/appeal-planning-decision.](https://www.gov.uk/appeal-planning-decision)

Yours faithfully

A handwritten signature in black ink, appearing to read 'DP', is centered on the page.

Daniel Pope
Chief Planning Officer

Appendix 3 Consultation Letters to Bloomsbury CAAC and Brownlow Mews Group

Mr Hugh Cullum
61B Judd Street
London
WC1H 9QT

Date: 22 January 2024
Our ref: 66990/01/BK/RW/29190195v1

Mr Cullum

The Blue Lion, Gray's Inn Road, London – Bloomsbury CAAC

On behalf of our client, Lambournes Surveyors Ltd ('the Applicant'), we are writing to inform you of our intentions to submit a planning application in relation to The Blue Lion pub, Gray's Inn Road, London ('the Site').

We are writing to you due to your interest in the previous application submitted at the Site in 2022 (ref. 2022/3534/P). Following the refusal of planning permission last year, our client is seeking to submit a new planning application for a revised scheme involving the refurbishment and extension of the building at the Site which addresses the previous reasons for refusal and current planning policy.

The revised proposals have evolved considerably in response to the comments received on the previous application and represent a substantially amended scheme in terms of impact to the existing building, including the pub, and the proposed residential accommodation. Notably, the number of flats proposed has reduced from seven to four.

We have engaged in pre-application discussions with officers at LB Camden who have been supportive of the overall approach and consider the proposals to be a positive improvement from the previous application refused at the Site.

Given your previous interest in the Site, we would be happy to meet with you to discuss the proposals, and specifically the changes which have been made to the scheme, ahead of submission of the application, or alternatively during the determination period. We are currently targeting the submission of the application during February 2024.

Please contact me (rosie.williams@lichfields.uk) or my colleague Adam Donovan (adam.donovan@lichfields.uk) if this is something that would be of interest.

Yours sincerely



Rosie Williams
Planner
BA (Hons) MA MRTPI

Brownlow Mews Group
9 Brownlow Mews
London
WC1N 2LD

Date: 22 January 2024

Our ref: 66990/01/BK/RW/29190210v1

Dear Sir/Madam

The Blue Lion, Gray's Inn Road, London – Brownlow Mews Group

On behalf of our client, Lambournes Surveyors Ltd ('the Applicant'), we are writing to inform you of our intentions to submit a planning application in relation to The Blue Lion pub, Gray's Inn Road, London ('the Site').

We are writing to you due to your interest in the previous application submitted at the Site in 2022 (ref. 2022/3534/P). Following the refusal of planning permission last year, our client is seeking to submit a new planning application for a revised scheme involving the refurbishment and extension of the building at the Site which addresses the previous reasons for refusal and current planning policy.

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Please contact me (rosie.williams@lichfields.uk) or my colleague Adam Donovan (adam.donovan@lichfields.uk) if this is something that would be of interest.

Yours faithfully



Rosie Williams
Planner
BA (Hons) MA MRTPI