



**CAMPAIGN
FOR
REAL ALE**

**Campaign for Real Ale
Greater London Region**

Campaign for Real Ale (CAMRA)
Greater London Regional Executive
c/o 47 Mehetabel Road
Hackney
London
E9 6DU

18 March 2015

Jonathan McClue,
Development Management,
London Borough of Camden,
Camden Town Hall Extension,
Argyle Street,
London,
WC1H 8EQ

Dear Jonathan,

Planning Application – 2015/0906/P – The Admiral Mann Public House

I write to OBJECT on behalf of the Greater London Region of the Campaign for Real Ale (CAMRA). **The Admiral Mann** pub falls within our North London branch area. We are a leading consumer rights organisation with over 170,000 active members campaigning for the preservation and enhancement of pubs, real ale, cider and perry.

1. The above scheme seeks to interfere with a perfectly acceptable and viable status quo that has altered little since 1881 for only marginal public benefit – namely the addition of six residential units for private sector sale or rent.
2. You will be aware that trading, profitable and highly-valued public houses are actively targeted by predatory developers in order to convert them to more profitable uses; normally residential or retail. This is not just a problem for Camden but is a national scandal, as recognised in various government reports and regularly highlighted by our campaign.

3. To meet this growing threat to our heritage and culture and the root of our community social infrastructure, the government introduced specific requirements for local authorities to plan positively for the provision and enhancement of public houses and to resist their loss. This is articulated in **Paragraph 70** of the **Framework**.
4. The capital suffers from a particularly acute demand for residential land which has placed great strain on community infrastructure and resulted in the loss of some 2000 traditional pubs over the last 30 years. This has led the London Assembly to recently revise the **London Plan 2011** and pubs are afforded additional recognition and protection under **Policies 3.1B, 3.16, 4.8, supporting justification 4.48A** and **Policy 7.1**.
5. As you will be aware, London Boroughs are actively encouraged to bring forward, develop and evolve their own specific pub protection policies as part of their local plans. Camden ranks amongst the best in London in this regard with their recent exemplary handling of **The Golden Lion** on Royal College Street and their bold decision to protect **The Old White Bear** in Hampstead through the making of an Article 4 Direction.
6. Your colleagues in planning and members of the Council with whom we are in contact have recognised the past mistakes made by the consenting of mixed-used schemes on the borough's established pub sites. The cases of **The Dartmouth Arms** in Tufnell Park and **The Alfred** in Primrose Hill are regrettable and have both led to a questionable future for the pubs concerned. We have vast experience of upper floor conversions, building on beer gardens, building in pub alleyways and forecourts, and transferring pubs into cellars! We are convinced as a campaign that splitting the planning unit normally spells the end of the pub in the long-term. Many London Council planners agree with us.
7. There is an added complication in this case as **The Admiral Mann** is on Camden's register of **Land of Community Value**, as defined in **Section 88** of the **Localism Act 2011**. Splitting of a planning unit which is land of community value is problematic. You will be aware that residential land cannot be land of community value. Currently the pub benefits from ancillary accommodation which makes it a very attractive proposition to pub operators. The management is able to live on the premises, providing close supervision at all times, and signing for deliveries etc during the day time when the pub is not trading. These arrangements in pubs were of course by design, and not by accident. Although there are examples of 'lock up' pubs in London which apparently work, the long-term viability and sustainability of **The Admiral Mann** would be best safeguarded, in accordance with the Council's obligations under national and regional planning policy, by insisting that the pub remains a singular planning unit, with its associated ancillary flat for the publican.
8. The registration as an **Asset of Community Value** demonstrates value as required by **Paragraph 70** of the **Framework** and **Section 4.48A** of the (revised) **London Plan**. You will also be aware that from 6th April 2015, this registration will remove permitted development rights on the pub, a further indicator of the government's recognition of the importance of public houses to our communities.

9. The additional clause inserted at **Section 4.48A** was drafted by Assembly Member Steve O'Connell, with support from our organisation and received widespread support at the Examination in Public stage, during September 2014. It states:

“The Mayor recognises the important role that London public houses can play in the social fabric of communities and recent research highlights the rapid rate of closures over the past decade and the factors behind these. To address these concerns, where there is sufficient evidence of need, community asset value and viability in pub use, boroughs are encouraged to bring forward policies to maintain, manage enhance public houses.”

10. On the face of it, this application would appear to be of no harm or detriment, in that the proposal seeks to retain the existing A4 use in the historic pub. However, we have a number of concerns:

- i) The splitting of the planning unit and the intensification of residential use immediately adjacent to an operational public house is fraught with difficulties such as noise complaints, licensing restrictions, interference with the proper operation of the A4 community use;
- ii) Planning inspectors have previously described such proposals as a “Trojan Horse” where developers seek to weaken and ultimately extinguish the pub business on the site, with a view to an eventual 100% residential use as this maximises their profit. The planning system exists precisely to protect communities against these negative impacts of the free market;
- iii) Contrary to the floor-space figures provided in the application form, the proposal will result in a reduction in A4 community social space, estimated by a team of very familiar regulars as a 40% loss. Some of our members have used the pub for around 40 years and know the building intimately. They have scrutinised the plans against the existing layout and are entirely convinced that the trading space will be diminished thus;
- iv) The reduced floor area would make wheelchair access difficult, would reduce the available seating by over one third, would hinder the function of dart teams, prohibit the provision of buffet food, remove any possibility of entertainment space, remove the two-room traditional layout. In summary the proposal seeks to turn a purpose-built traditional community pub into a basic lock-up bar, completely destroying its identity and charm, the very characteristics that led to its nomination as an ACV in the first place.

11. The Admiral Mann is locally listed with Camden as a non-designated heritage asset. **Paragraph 135** of the **Framework** requires planners to have due regard to the scale of harm and the effect of any proposals on such assets. Victorian pubs were traditionally laid out with at least two independent rooms, usually referred to as the ‘Public Bar’ and the ‘Saloon Bar’ or ‘Lounge’. This segregation reflects the social division and class hierarchy structure of Victorian society and it is an important reminder of our cultural past. So many traditional pubs have been altered or destroyed through reckless stewardship. Camden recognised the significance of **The Admiral Mann** and the Council has a duty to safeguard it for future generations to enjoy.

12. Camden Council's adopted **Development Policy DP15** requires the Council to *protect existing community facilities by resisting their loss*. Supporting statement **15.7** specifically outlines the Council's ambition to *protect community pubs and to resist their loss*. The developer will argue that this scheme will not result in the loss of **The Admiral Mann**, but our experience, and that of Camden's own planners, suggests otherwise.
13. **The Admiral Mann** as we know it, in its historical community pub role, will cease to exist if this scheme is allowed. A lock-up pub is unlikely to work at this location as this is a back-street, community pub, which serves local people and regulars plus sports teams and visitors to the area on football days.
14. CAMRA recognises the need for housing and understands the ambitious targets placed on the London Boroughs by the Mayor but new housing should not come at the expense of London's character and personality. Pubs are local landmarks and iconic places of refuge through the generations. Sustainable development is often quoted by developers but conveniently they omit to mention the 'social role' which is a fundamental element. The job of Local Planning Authorities is to achieve the right balance between delivering the right style of *affordable* housing and protecting and enhancing the social and other essential infrastructure which make up cohesive communities. Without traditional pubs and other places for neighbours to meet, London would simply be one sprawling, soulless residential dormitory.
15. When McMullen's sold the pub, as a going concern to the present owner, the new freeholder immediately shut the business down, much to the horror of local residents and pub regulars. One needs to question the motives of such a move, which makes no economic sense. The owners have employed the services of property guardians to provide security on the premises for over six months, at considerable expense and with no income. If the developer was serious about retaining the pub, and building flats around it, would it not have made more sense to retain the publican, employing staff, paying business rates, contributing to Camden's economy and providing a vital community service? From their own perspective they could have enjoyed a market rent whilst the planning matter under consideration was decided, providing a return on their freehold investment regardless of the outcome of the planning decision. Instead they chose to shut the pub, alienating the community and creating economic harm to the borough with the loss of 3 full-time and 5 part-time jobs, the knock-on effect in the local supply chain with the loss of food and drink orders and the erasure of economic activity surrounding the pub, estimated by the IPPR to be in the region of £80,000 annually.¹ Sadly, this is a pattern of behaviour we have come to recognise. The owner is interested in the return from residential conversion and cares little for the pub. Moreover, the proposal would effectively 'squeeze' the existing pub into a substantially diminished lock-up and
16. We would urge officers to recognise this scheme for what it is: the piecemeal, sequential loss of an historic community pub, which is an **Asset of Community Value** and a **non-designated heritage asset**. Do not repeat the mistakes of **The Alfred**, **The Richard Steel** and **The Dartmouth Arms**, but instead build on the success of **The Golden Lion** and **The Black Cap**.

¹ See Rick Muir *Pubs & Places*, Institute for Public Policy Research, 2012.

Camden has a mixed record on pub protection in recent years. Whilst many traditional pubs have sadly been lost to alternative use and demolition, some very high profile success stories have also helped to promote the Borough and the Council is rightly proud of its pub protection credentials – currently being further reviewed and strengthened, which is to be welcomed. You will be aware that London is at the forefront of a national craft beer and microbrewery revolution and there is considerable demand for well-managed pubs. It is short-sighted to sacrifice our existing entirely suitable pub stock for short-term marginal housing gain. This is contrary to sustainable development, to the requirements of the Framework and the London Plan and conflicts with Camden's own policy DP15.

Accordingly, we invite the Council to PLEASE refuse consent.

Yours sincerely,

James Watson
Campaign for Real Ale – www.camra.org.uk