



**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

16 August 2015

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

Dear Jonathan,

**Planning Application – 2015/4456/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 173,000 active members campaigning for the preservation and enhancement of pubs, real ale, cider and perry.

1. Although the above proposal is an improvement on previous applications, and particularly on the application for a certificate of lawfulness for an A1 use of the premises, we remain opposed to the splitting of the planning unit, which principally houses an **ACV-registered** pub, and the change of use of this locally-listed building, which is a non designated heritage asset.
2. Without wishing to unnecessarily repeat our earlier points, with which the Council will be very familiar, pubs are protected under **Paragraph 70** of the **NPPF** and at **Sections 3.1B, 3.16, 4.48A, 4.8 and 7.1** of the **London Plan**. There is a requirement for Councils to plan positively for the provision and sustainability of pubs as well as resisting their loss.

3. The registration of **The Admiral Mann** as an **Asset of Community Value**, and the well-orchestrated campaign by the **Friends of the Admiral Mann**, supported by CAMRA and others, is evidence enough of the value of this pub and the pain and loss suffered by the community as a result of its continued (and needless) closure.
4. Any reputable pub surveyor or licensing broker will confirm that pubs are more attractive, sustainable, and viable propositions if their ancillary accommodation and support functions remain intact. A pub with kitchen, sizeable cellar, ancillary accommodation for the publican, as part of an integrated whole i.e. SINGLE planning unit is more likely to survive as a pub in London's constantly changing property landscape.
5. The Council should draw lessons from the cases of **The Dartmouth Arms**, **The Albert (Primrose Hill)** and **The Sir Richard Steele**. In the former two cases, the Council granted consent for the splitting of the planning unit and the creation of separate, independent C3 flats above the pub. These cases are always problematic due to concerns over noise, the removal of the freehold from the common ownership and control of the pub operator, the creation of residential units very close to what is inherently a noisy environment by purpose and function and the complexities of parts of the demise being subject to additional restrictions and controls due to the **Localism Act**. It can be a legal and planning minefield!
  - i) **The Dartmouth Arms** is registered as **ACV** but the Council already granted consent for upper floor conversion with the retention of the ground floor A4 pub. The owner claimed to be refurbishing the ground floor of the pub at the same time as the conversion works for the flats. The work was due to complete in April but the pub remains closed. The owner has since challenged the ACV status.
  - ii) **The Albert** received consent for C3 flats above, again with retention of the pub below and the proposal to build two houses in the beer garden was rejected. As soon as consent was obtained for the flats, the pub operator placed the Albert on the market with a residential property company for over £2M.
  - iii) **The Sir Richard Steele** applied for a similar split yet the Council rejected this in order to retain the function room. We supported this decision and we are delighted that the Council's decision was upheld on appeal.

From discussions with officers and members, we are aware that the Council now regrets the former two decisions but feels rightly vindicated over the latter. The lesson here is clear; do not countenance the splitting of a planning unit on freestanding freehold pubs. Experience has shown that such a move rarely ensures the sustainability of the pub and on the contrary, in Camden's overheating speculative property market, it can often result in quite the opposite happening in practice.

6. We would urge the Council to insist that **The Admiral Mann** is required to remain intact, as one individual planning unit, with accommodation above and the community pub in its present form below.

7. As per previous applications, 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.
  - v) The only improvement on this relative to previously rejected schemes is the provision of a nominal ancillary flat. We would argue this is substandard and inadequate and there is no planning justification for interfering with the existing perfectly acceptable arrangements, which have worked well for over 150 years.
8. 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.
9. When McMullens 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 owner has 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.<sup>1</sup> 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.

10. The present owner has a track record of converting pubs to residential use. His LinkedIn profile makes much of this in describing his experience as “Pub conversions in North London”. Based on a previous attempt to convert the premises to retail, first by undertaking physical although not material development, and latterly trying, unsuccessfully, to regularise it with a certificate of lawfulness, we would question his reliability as an applicant. The Council could well grant consent for this, believing that the proposal would save **The Admiral Mann**, only to discover that once the flats are converted and the profit realised, the ground floor is once more converted to an alternative and unsatisfactory use.
11. McMullens brewery sold the pub for £1.7M which is many times its market value. The applicant paid a speculative price on the assumption that he would later obtain consent for residential use and the purchase would be a viable prospect. This kind of behaviour is happening all over Britain and is destroying our heritage and culture. It is the role of the planning system to safeguard public amenity and to protect communities from the negative impact of the free market. Moreover it is not the role of the planning system to bail out developers who overpay for pubs. We submit that the Council should REFUSE consent on this scheme and insist that the whole building remains in A4 use, as per strategic policy to resist the loss of pubs. The applicant has provided no evidence that the pub has been marketed at a fair price for a period of 2 years. Were this to happen, we are beyond confident that there would be a great deal of interest from pub operators. That interest would be substantially diminished if the Council allows the splitting of the planning unit.

Accordingly, we invite the Council to PLEASE refuse consent.

Yours sincerely,

James Watson  
Campaign for Real Ale – [www.camra.org.uk](http://www.camra.org.uk)

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