

TAPPING THE ADMIRAL

77 CASTLE ROAD
LONDON NW1 8SU

PLANNING STATEMENT TO SUPPORT AN APPLICATION FOR, ALTERATION AND
EXTENSION TO FORM 3 SELF CONTAINED APARTMENTS TO BE RUN IN ASSOCIATION
WITH THE PUBLIC HOUSE BUSINESS.



ISSUED ON
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1.00 INTRODUCTION AND OBJECTIVES

- 1.01 This application seeks full planning consent from the London Borough of Camden for the formation of 3 self-contained flats (3 x 2 bed 4 person) to include a mansard roof and rear extension to be run in association with an A4 drinking establishment to provide short term lets.
- 1.02 This statement will provide a detailed analysis of the proposals and how these accord with relevant local planning policy.
- 1.03 This statement should be read with the other application documents as noted within the design and access statement.
- 1.04 The objective of the proposed development is intended to achieve the important planning aims of regeneration and sustainable design development, arising out of the site's particular characteristics and accessible location, together with the existing planning policy context. In particular;
- Conversion to use Associated with an A4 drinking establishment, which will embrace sustainable values and is innovatively designed to meet modern living requirements.
 - Effective and efficient use of the site.
 - A significant enhancement to the character of the site and surrounding area.
 - Short Term letting provision for 3 residential flats, which meet considerable local demand.
- 1.05 Summary of main issues.
- Loss of residential associated with an A4 Drinking Establishment use and potential erosion of A4 Drinking establishment use.
 - Housing Need
 - Design And Sustainability.
 - Impact on neighbouring amenity.
 - The impact upon neighbouring properties and the surrounding area.

2.00 SITE DESCRIPTION

- 2.01 This is covered within the design and access statement.
- 2.02 The site as stated in the access and design statement has excellent access to Public transport links and nodes. North of the site is Kentish Town West station which is on the London Overground and a few minutes walk. There are a number of buses in the locale such as 24, 46, 214, 393 and the C2. Camden Town underground station is again a short walk from the property.

3.00 PROPOSALS

- 3.01 The proposals are to retain the existing premises and alter these internally with an extension at roof level and to the rear. The overall height of the building is virtually unchanged with a recessed mansard to reduce its visibility. Any height increase is centred on the upper level by virtue of the mansard extension.
- 3.02 The proposal is for 3 flats and more specifically 3 x 2 bedroom units. They will be for short term market rental due to the applicant having a 25 year lease on the premises. The flat sizes and layout are contained within the architectural layouts.

- 3.03 The flats due to the layout of the existing building do not have private amenity spaces but a token communal amenity space is provided at the entrance to the apartments.
- 3.04 The site has excellent transport links and due to the local controlled parking zone it is accepted that the residential units will be car free.
- 3.05 The Building achieves a 24.8% reduction in CO2 levels as noted and the improvements made to the existing fabric assist this. There are 12 Photovoltaic panels to assist in reducing the buildings carbon footprint.
- 3.06 The flats have been designed to be Lifetimes homes compliant despite being only available for short term letting.

4.00 PRE APPLICATION ADVICE

- 4.01 Planning feedback was received from a Camden Planning officer prior to withdrawal of the application reference 2017/0777/P. This was contained within correspondence from the case officer at the time.
- 4.02 It was considered at the time that the design of the roof extension would detract from the locally listed building combined with a lack of evidence to demonstrate that the proposed uses (residential (C3) and Drinking Establishment (A4) primarily between Ground and First Floor levels can be co located without prejudicing the long term viability of the pub or the standard of residential amenity by virtue of noise transmission / disturbances.
- 4.03 The officer then provided advice in respect of redesigning the scheme to address the above concerns.
- 4.04 Design of the roof extension would need to be amended to be a more traditional mansard style, carefully detailed to respond to the main façade of the building. Full drawings and details (ie 1:20 elevations and sections of windows and typical roof section) would therefore be expected. The roof would be expected to comply with the design guidance set out in the Council's Design Guidance document. A design of this kind may also result in additional GIA created at 3rd floor level. Please ensure that attention is paid to Camden's Design Guidance (CPG1) regarding Mansard roof extensions.

The current application has taken on board the officers comments and changed from a contemporary extension to a traditional mansard that responds to the main façade architecture with alignment of the windows. This has been carefully detailed and complies with the design guidance CPG1. We now believe that we have satisfied Camden's requirements in respect of this. The details requested have been submitted as part of the application.

- 4.05 In order to demonstrate that the use of the upper floors for self-contained residential units would not jeopardise the long term viability of the pub; the Council would expect to see comprehensive reporting outlining full details of proposed noise mitigation measures of the building's envelope and floor/ceiling separation. It should be stressed that the Council would object to any proposal for conversion of upper floors unless adequate details were submitted for us to be confident that the two uses can co-exist without adversely affecting the operation of the public house. To achieve the relevant level of sound mitigation for upper floors, it is considered likely that suspended floors and/or high quality noise insulation measures would be required throughout. It was noted that the noise survey submitted included noise measurements taken for a 24hr period between a Monday and a Tuesday and recommended the installation of noise mitigating windows only. This survey would need to be updated to include readings taken over at least one weekend (period of 48hrs), should include readings taken at all upper floors and needs to address this issue very carefully. It would also be expected that the mitigation measures recommended as part of this assessment are fully detailed within submitted drawings so that officers can be confident that they would be viable whilst retaining the building's envelope.

4.06 Officers are concerned about the potential impacts upon residential amenity from levels of noise from the pub below and the railway behind the units but also that the viability of the pub could be compromised by the residential use at upper floors if they were to be impacted upon by noise and disturbance. As such we would require fairly comprehensive reporting to demonstrate that the two uses can coexist before officers could support any scheme involving the conversion of upper floors. As such I would recommend that details are provided which include the following:

1. Full details of proposed sound insulation measures of the building envelope and floor / ceiling separation, orientation of habitable rooms away from major noise sources and of acoustically attenuated mechanical ventilation as necessary to achieve a daytime (07:00 - 23:00) internal noise level of NR20 and night time (23:00 - 07:00) internal noise level of NR15 in all habitable rooms. No alteration should be made which would result in the specified internal noise levels being exceeded. (Noise Rating curves should be measured as a 5 minute linear Leq at the octave band centre frequencies 31.5 Hz to 8 kHz).
2. An appropriate automatic noise control device must be fitted to all amplified sound equipment. The device must be:
 - a) Set so that the volume of any amplified sound emanating from the premises does not cause a public nuisance. A Compliance Certificate must be supplied for the installation of the unit before any regulated entertainment is carried out. For clarity: The installation must be carried out by a competent/qualified person and submitted for approval. The compliance certificate must contain the following; 5 minute LAEQ and Full Spectrum Frequency analysis
 - b) The devices must be fitted to all power outlets to the premises (i.e. to the main distribution unit controlling power outlets)

The applicant will fit an automatic noise control device and this is covered within the acoustic report. We would suggest that this requirement is conditioned and prevents occupation until it is discharged.

- 3 Noise report demonstrating that noise level emitted from plant, machinery or equipment at the development remain lower than the lowest existing background noise level by at least 5dBA, by 10dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with machinery operating at maximum capacity.

The existing plant or machinery is lower than the ambient level see acoustic report. There is to be no new plant or machinery.

- 4 Details of proprietary anti-vibration isolators for the mounting of machinery/plant system and associated ducting. Details should demonstrate that fan motors shall be vibration isolated from the casing and adequately silenced.

The plant and machinery is existing and as such covered under the acoustic report. There is to be no new plant or machinery.

- 5 Full details of building vibration levels generated by the adjacent railway etc. together with appropriate mitigation measures where necessary. The criteria to be met and the assessment method shall be as specified in BS 6472:2008

The vibration levels generated by the adjacent railway are included within the attached acoustic report and confirm that this is acceptable.

- 4.07 In terms of the internal layout proposed, it would be the preference of the Council for the proposed unit mix to include further 3, or 2 bedroom units where possible rather than 1 bedroom units due to the level of demand for units of this size. Due to the requirements of point one, it is considered that maintaining one unit per floor may therefore be a more appropriate solution which would also address this point. Also, in light of the second point raised, it would be recommended that the most sensitive habitable rooms (i.e. main bedroom and living room) for proposed units are all set as far away from the pub's garden as possible so that noise from this area has a lesser impact.

Note that in order for the scheme to be supported the unit mix provided would have to remain in accordance with the Dwelling Size Priorities table set out within the Council's policy DP5 (Homes of different sizes) and emerging policy H7 (Large and small homes). As such I would recommend that your supporting planning statement addresses the requirements of this policy with regard to the mix of unit sizes provided. A copy of the emerging policies can be found here, please see pg.92 for policy H7 (which is due to be adopted formally next month). Officers are of the view that by increasing the area of the roof extension, the provision of 3 units (2x2beds and 1x1bed OR 3x 2beds) would still remain a possibility unless this is demonstrated to not be viable.

The proposed layouts for the floors are in line with the councils recommendations for 1apartment per floor to provide 3 x 2bed apartments. This would mean that all room uses would align as is preferred.

In respect of Policy H7 Large and small homes, the scheme provides for a high requirement within the priority table for 2 bedroom Market housing. There is a lower demand for 1 bedroom apartments and as per the councils advice we have not included a 1 bedroom apartment. There is also a high requirement for 3 bedroom apartments within the priority mix table however it is not felt suitable to provide a 3 bedroom apartment as this would be a family unit and not suitable or commercially viable above a pub as well as space constraints prevent this.

The Council also states that it will be flexible when assessing development against Policy H7 and the Dwelling Size Priorities Table. The mix of dwelling sizes appropriate in a specific development will be considered taking into account the character of the development, the site and the area. We believe that 3 x 2 bedroom apartments to suit the character of this specific development, site and area as confirmed by the original officer.

The council recognises that where a reuse of an existing building is involved as with this application, this may limit the potential to provide a range of dwelling sizes. The Heritage asset of this locally listed building could be best preserved by retaining its architectural footprint and conversion to 3 x 2 bedroom apartments suit the internal layout and existing architecture. This is relevant to this application.

This scheme provides a rational layout with room uses over each other which is most desirable and minimises noise disturbance.

In addition the council is being more flexible with heritage assets to bring back into use vacant and derelict buildings. As the upper floors are derelict and above a commercial use this flexibility should be applied to the current application.

- 4.08 Finally it should be noted that in order for the Council to support schemes including the creation of new residential units, a legal agreement would be expected to be secured for the new units to be 'car-free' (i.e. be restricted from applying for parking permits).

In the previous application it was noted that a car free development would be accepted and this is still the case. We note a legal requirement would be expected and once provided by the council this can be completed. We would respectfully suggest that this is conditioned for completion prior to occupation.

- 4.09 It would also be recommended that full details of the cycle storage proposed are submitted up front and designed in accordance with the Council's Transport Guidance document.

Details of the cycle store are included with this application and we can confirm that they are designed in accordance with the Council's Transport Guidance document. 3 bike spaces are provided at the entrance to the building within a secure area behind the entrance door.

- 4.10 If you/your client is willing to address these above concerns in a committed fashion, it is my view that the objections raised to the current application could be overcome.

The applicant has been and continues to be flexible as with previous applications and has amended these to suit Camden's requirements. We have addressed all of the items contained within the pre application advice from the previous case officer.

5.00 PLANNING POLICY

- 5.01 When determining applications for planning permission, the local authority is required to have regard to the development plan, so far as material and to any other material considerations. In addition, the determination must be made in accordance with the Development plan unless material considerations indicate otherwise.

Relevant planning policy;

1. The London Plan; Spatial Development Strategy for Greater London (July 2011)
2. Local Development Framework: Camden Core Strategy 2010 – 2025.
3. Local Development Framework: Camden Development Policies 2010 - 2025
4. Supplementary Planning Guidance (SPG) Camden November 2014.
5. Supplementary Planning Guidance, community uses, leisure facilities and pubs. (SPG) Camden Draft November 2017.

Relevant to this application are Camden's development plan consisting of Core Strategies (CS) and development policies (DP). There is supplementary planning guidance which needs to be taken into account (SPG)

5.02 CS6 PROVIDING QUALITY HOMES

This document's main drive is to maximise the supply of housing within the borough of differing sizes.

The proposal adheres to the principles of this policy by providing housing and bringing back into use derelict upper parts for a sympathetic use and housing as a priority land-use and from a net increase in homes in an existing building.

The flats are 2 two bedroom apartments have been provided in line with DP5 and more specifically the accommodation schedule with a greatest demand for 2 bedroom apartments. This is also the most sympathetic mix and complements the existing Architecture with the minimum structural intervention. The Council also acknowledges in line with DP5 that there is a need and/ or demand for dwellings of every size shown in the Priorities Table and that they expect some provision of units not shown as a priority. Following advice from Camden planning officer the preferred mix is 3 number 2 bedroom apartments. .

It is considered that the proposed residential flats would constitute a high standard of design, would enhance the setting of the area, would complement the coherent and predominant character of the road and would successfully recognise the rhythm, height and proportion and plot relationships of neighbouring properties, because the building exists, the rear extension is modest and the mansard roof extension in keeping with the surrounding buildings.

National planning Policy framework states that policies should avoid long-term protection of employment land or buildings and applications for alternative uses should be treated on their merits having regard to market signals and the relative need for land uses. This is an important consideration and the councils approach to this scheme needs to be taken in this context.

There is a substantial need for housing in the London borough, but it is important that this does not lead to development that adversely impacts on local character and established residential areas. The quality of housing to be provided is as important as the quantity.

The site is considered to be an appropriate location for residential accommodation. The London borough of Camden's housing target is 8,925 Between 2010 to 2025 that equates to approximately an additional 595 homes a year!

The proposed use is considered appropriate in this largely residential area and would not result in any detriment to the neighbouring amenity and the host building.

5.03 CS11 PROMOTING SUSTAINABLE AND EFFICIENT TRAVEL.

Promotes sustainable and efficient travel. This can be by provision of cycle parking and the councils desire to limit or remove private car parking

The proposals include for a secure bicycle store facility at ground floor level. It is proposed that this is a car free development on the basis that there is no space for vehicle provision. In addition the existence of a controlled parking Zone (CPZ) indicates a need to control parking in a saturated parking area.

5.04 CS13. TACKLING CLIMATE CHANGE THROUGH PROMOTING HIGHER ENVIRONMENTAL STANDARDS.

This policy promotes higher environmental standards in new buildings. This can apply to existing buildings. This policy encourages land usage that limits the need to travel by car. In addition the efficient use of land. Also to minimise carbon emissions by way of generating renewable energy on the development site.

By virtue of its location and its excellent transport links this site contributes to a land usage that limits the need to travel by car. There is no provision for car parking spaces both private or within the CPZ. It therefore encourages the use of public transport and bicycles. There are also car club facilities within the area should the need arise where public transport cannot fulfill the need.

The conversion of the upper parts to residential ancillary with the Public House use, makes much better use than the current space above the public house which is and has been vacant and derelict for over 8 years. Previously occupied by unauthorised squatters this space is surplus to requirements for the A4 use and its conversion has only a positive effect on the business continuity of the public house. The desire must be to bring back into use all redundant space above businesses that would suit residential as these will provide much needed housing stock with the minimum urban impact. The result is 3 high quality apartments of the most needed size in a much sought after area.

The building makes a 24.83% reduction in CO2 emissions when compared with the 2010 building regulations. Improvements to the building fabric and provision of 12 high capacity Photovoltaic Cells are all part of these proposals. The PV's are laid horizontally to have the minimum impact visually on the building.

The development would achieve a BREEAM Domestic Refurbishment Excellent rating in accordance with the London Plan 2011 and local planning policy targets.

5.05 CS14 PROMOTING HIGH QUALITY PLACES AND CONSERVING OUR HERITAGE.

This has two aims both to promote high design standards while in addition preserving Camden's heritage asserts.

This building is not listed nor is it within a conservation area however it is a building noted on Camden's local list.

The proposal is for the retention of the existing, building along with sensitive refurbishment to bring this back to the standard it should have been kept in. 2 modest extensions, one to the rear tower which will be designed to blend with the original architecture and a mansard roof extension with a traditional approach. This is to be set low within the roof top and to be set back from the edges with a natural slate finish to minimise its impact. This is covered more fully within the design and access statement.

The building extension on the roof is approximately 1.2m higher at head of the rake of the mansard above the existing parapet. It is 1.6 metres at its highest point above the par part. It is set back from the Castle Road and Hadley Street elevations. The actual site coverage remains unchanged but with a more efficient use of the 2 modest extensions to increase the volume of the building, therefore retaining the Architectural essence and appearance.

The new access will be compliant with Part M in terms of the staircase being suitable for varying types of disabilities. However due to the continuing Public House use and the existing Architectural layout and form of the premises it is unfortunately not possible to provide a wheelchair accessible flat.

The proposals respect and enhances the heritage, character and local distinctiveness of the centre while making the most efficient use of the existing site.

The site constitutes land for A4 Drinking establishment however it is not specifically identified for employment or A4 drinking establishment purposes. Nevertheless the council policy seeks to retain land, sites and buildings that were last used for these purposes in the same class use. It is important to note that the Public House is covered by an ACV listing and is as noted an active business that is to continue. The granting of this application will in no way erode the public House operation and will only strengthen its survival.

The existing building after so many years of neglect and a lack of investment due to being vacant and the unsuccessful previous business is in very poor condition both cosmetically and structurally. The proposed development presents an opportunity to enhance the streetscape features of the site as well as restoring the character of the surrounding street. It will reinstate high quality built form to complement the existing urban grain.

In weighing up proposals for this building, finding the optimum viable use for a heritage asset may require the local planning authority to apply other development control policies flexibly and imaginatively to achieve long-term conservation. Local authorities need to take into account the likely longevity of any public benefits claimed for a proposed scheme.

It should be acknowledged that the physical character and amount of development has changed the surrounding area in recent years through the driving force of regeneration. This investment has produced an attractive force of regeneration. This investment has produced an attractive environment, none of which was possible in the area's historic heyday. This is an important point as the character of the area, while having important historic references is not a re-creation of those earlier times.

In the wider streetscape, the scheme will compliment the existing scale of the adjoining areas while providing a progressive increase in scale to establish a legible visual and physical connection. This will provide positive enhancements to the surrounding

streetscape, including integration with the existing and contrasting and varied developments within the immediate surrounding areas.

It is recognised that generally the best way of securing the upkeep of historic buildings and areas is to keep them in active use. For the great majority this must mean economically viable uses if they are to survive, and new, and even continuing, uses will often necessitate some degree of adaptation. The best use will very often be the use for which the building was originally designed, and the continuation or reinstatement of that use should certainly be the first option when the future of a building is considered. But not all original uses will now be viable or even necessarily appropriate, this is the case here where the residential associated with the Public house is not viable or as demonstrated over the past 5 years required to operate the pub successfully unless it is converted to self contained short term lets. It was originally designed for residential and that it would be the most appropriate use for any conversion.

5.06 CS18 DEALING WITH OUR WASTE AND ENCOURING RECYCLING.

This policy encourages recycling of waste from commercial and domestic premises. There is a requirement for facilities to store waste and recycling and for their collection.

The proposals include for a covered waste and recycling area for these purposes to the rear yard at Ground floor level. The Public House has its own recycling and waste facilities outside of this area already in existence.

5.07 SUPPLEMENTARY PLANNING GUIDANCE (SPG)

Taking the relevant SPG standards that apply to the proposals.

5.08 CAR FREE HOUSING.

The proposals comply within this as noted above and within the design and access statement.

5.09 Cycle Access and Storage.

The proposals comply within this as noted above and within the design and access statement.

5.10 Daylight and sunlight.

This remains virtually unaffected as the principle building is being retained and the extensions have a negligible effect on this. The extensions are to the Northern part of the site and the sun path will not be affected.

5.11 Energy and renewables.

A report by Ashby engineering is attached and they have confirmed that the scheme offers over the minimum 20% CO2 reduction in carbon emissions.

5.12 Lifetime homes and wheelchair housing

This is covered more fully within the Design and Access statement, however it is fully compliant with Lifetime Homes Standards where relevant.

As mentioned previously due to the location being on the first floor and above it is not possible to provide a fully wheelchair accessible apartment however these will be as fully compliant with Part M of the building regulations as far as possible.

5.13 Noise and Vibration.

Refer to the above comments and the attached Noise and Vibration survey undertaken by KP Acoustics as commissioned by the applicant.

In terms of noise and vibration from the adjacent railway line, commercial under viaduct units and Public House a report is attached which indicates that the design of the premises takes into account any required mitigation measures. However the report identifies that the only requirement is for the new windows to meet the design performance criteria provided. As such timber double glazed sliding sash windows are to be used to replace existing and for new openings.

5.14 Overlooking and Privacy.

Guidance is based on an 18m minimum face to face dimension for habitable rooms to provide adequate privacy to the occupants. As the building exists the face to face dimensions have not changed and these do not overlook habitable rooms. The windows to the rear of the property do not overlook the neighbours property directly and the remaining view is to the railway viaduct which is as such a blank elevation.

Planning obligations

With regard to the community infrastructure levy we acknowledge that once planning permission is granted the council will issue a levy liability notice if it applies in this case.

It must be considered in relation to this application that the applicant is a leaseholder and not the Freeholder and that any proposal has limited financial value as they are unable to dispose of the market housing to realise their capital investment. As such it would seem a little harsh to apply an affordable contribution to the building. In addition the works required to bring this Heritage asset back to its former glory involves considerable work and cost. The benefit to the council is preservation and reinstatement of a locally listed heritage asset.

We would suggest that no affordable housing is required due to the constraints of the site and we understand following the Written Ministerial Statement (WMS) and NPPG update of 28 November 2014 that no contribution should be required from the proposed development, this was quashed, however subsequently overturned on appeal. The WMS being a material consideration in the decision making process. The planning department has the right to consider what is relevant here

The applicant is also bringing back into use previously derelict floor space. However, in light of the Ministerial Statement and NPPG update of 28 November 2014, advising that contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development, the Council should no longer seek affordable housing contributions which would need to be secured through a Section 106 agreement from developments of 10-units or less and which have a maximum combined gross floorspace of no more than 1000sqm. In this case, the site's constraints do not allow for either threshold to be exceeded. If this was a development where if the units could be sold then a tariff might be applicable. We of course leave this to the council to make the right decision.

Residential standards

The gross internal areas for the proposed development have been designed in accordance with the Council's SPG and also the London Plan. The ceiling heights vary however the minimum ceiling height is 2.3m. The internal areas for each apartment type are exceeded and a schedule of these areas is provided as well as being annotated on the application plans. The required built in storage is provided for each apartment.

Sustainable Design and Construction.

Covered under the design and access statement and above in more detail.

Waste Storage and Recyclables – on site storage.

Each apartment will be provided with an internal area for storage and recycling within the kitchen areas. Externally as covered above the waste and recycling provision is in accordance with Camden's standards.

5.19 SUPPLEMENTARY PLANNING GUIDANCE (SPG) COMMUNITY USES, LEISURE FACILITIES AND PUBS (draft November 2017)

Key messages.

1. It is noted that Camden apply a presumption in favour of retaining pubs and their associated facilities, where they meet the needs of community or protected groups.
2. Robust evidence will be required to demonstrate that all reasonable options have been thoroughly explored where the loss of pub floor space is proposed.
3. Proposals involving the partial loss of a pub will be carefully scrutinised to ensure this does not put at risk the ability of the retained pub to operate successfully.

Please note that this application does not seek to remove the current pub use or any of the areas currently used by the pub and the application is only related to areas outside of the current trading pub and therefore totally independent to its operation, conversion of non used derelict upper parts.

It has been established that Tapping the Admiral (TTA) public house meets the needs of the local community on the basis that it received an Asset of Community Value listing (ACV) on the 3rd August 2016. This listing covers the Ground levels only and is not related to the upper parts which were derelict when the pub was taken over by the current operators in 2012. (copy of the listing is contained within APPENDIX A)

The ACV listing was proposed by Campaign for Real Ale (CAMRA) due to the success that it has quickly become. It has received various awards and most notably from CAMRA. It has a back to traditional pub approach to business with an excellent invested management team and operator. Key is the focus on real ales and traditional pub food such as pies. It is popular with locals and real ale drinkers across London and beyond. Attached are some of the reviews the pub has received.(APPENDIX B)

TTA does not have any associated space for parties, celebrations or a function room for rent from the appearance of the existing layout of the pub when the current operator took over the premises there is no evidence that this pub ever had such a function room. The pub operation has been located at Ground floor only for at least 12 years according to research.

The pub is indeed of Architectural merit and is a locally listed building. Internally the public house ground floor retains some of its detail and character, however First floor upwards as noted below are devoid of any features.

The years of neglect while the property stood empty and subsequent occupation and ravaging by squatters has taken its toll on the structure and weather tightness of the building. As can be seen from the photos submitted the building is in an extremely poor state of repair and far from water tight with some structural works required. The property has been in this state since 2012 when it was taken over after being closed for 5 years.

When the applicant took over TTA the pub was seen as a less than social venue with a reputation not in alignment with that of a pub of community value. It did not provide a

social and safe place for the well-being of different users. Since the opening of the TTA, this has changed and it is now a comfortable social, safe venue for different users. The pub has reinforced its position as a building block for the community and this is evident from the ACV listing.

One of the major facts facing Public Houses as well as other businesses are increasing overheads such as central London rents and business rates. TTA is no different in this respect and upwardly only rent reviews and recent rate changes continue to put external pressures on businesses. In the case of TTA the leaseholder (applicant) is required to pay rent and rates for derelict upper floors that have no benefit to the pub operationally regardless of whether they are derelict or not. The fact they are derelict adds pressure as the pub needs to support not only itself but the 2 upper floors and building maintenance, the latter being extensive. The only realistic option is for the upper parts to be converted into self contained residential associated with the public house business.

The floor plate of the existing upper levels of the pub are laid out in such a way to provide an easy conversion with minimum disruption to the existing fabric. The proposal is for 3 x 2 bedroom apartments as suggested by Camden.

TTA is not a “vulnerable pub” as it has traded successfully and continues to do so on its own merits, without the use of the upper parts and just the ground floor since opening in 2012. This application is from a small Independent pub operator and not a property developer. The conversion of the upper parts only combined with out of hours independent access will actually assist in providing a more sustainable future for the pub. It will ensure its continued prosperity providing much needed capital funds to refurbish the exterior, upper parts and roof to restore the building back to its former glory.

The freehold of Tapping the Admiral is owned by Gary David Stores and Karen Ann Stores, and leased to Paul Davies and Kirk McGrath.

As the public house is on a leasehold basis i.e. the applicants do not own the freehold these apartments can only be rented. The income from the rent will assist with the rental and business rates that apply to the whole building despite only a third of the building is currently used. Therefore the business rates will reduce for the pub use and accordingly the apportionment of the rental providing a lower overhead and ultimately securing a financially certain future for the pub. The remaining rental and rates (council tax) will be covered by the letting of the converted upper parts.

There is no effect on the beer garden, kitchens, wc's and there is no staff accommodation, therefore the proposals will not undermine the pubs viability or its day to day operation.

TTA provides the following leisure and meeting facilities as well as those listed on the ACV nomination, cited below within the confines of the Ground floor.

1. Tapping the Admiral meets the social, recreational and cultural interests of the local community by providing a number of social events on a weekly basis that brings local people together. Examples include a platform for local musicians through open acoustic music events every Thursday that are attended by 20 to 40 people. The sessions include up to 8 to 12 local musicians to join in an open mic session and the sessions also encourage audience participation. On Wednesdays, the pub hosts a quiz night that is usually attended by 25 to 40 people.
2. Every month, the pub holds a ‘Tap Takeover’ event and tasting session to showcase specific breweries and ‘Meet the brewer’, which are attended by 30 to 50 local people. These events further the cultural interests of the local community

allowing local people to develop further knowledge and appreciation about types of beer and also socialise with others in the local community, thus furthering their social and cultural interests.

3. Tapping has good disabled access and it is also well attended by members of the local community such as teachers who visit the pub on Fridays after work, and a Book Club that meets, where local people bring and exchange books for free. Local events for the community, both run by local businesses and the community are regularly publicised at Tapping. The pub is regarded as a place where members of the local community meet and find out about what is going on in the local community, as well as hear about local job opportunities, and the pub provides access to free newspapers, all of which further the social well-being of the local community. Tapping is recognised for its 'local' feel, and it is described by the Londonist website at <http://londonist.com/pubs/tapping-the-admiral> as attract(ing) a hearty crowd of long-time locals and newcomers who've heard of its charms " (Article at APPENDIX C)
4. Tapping also hosts three to four beer and cider festivals each year. The festivals help support local businesses as they not only attract local people but also people from further afield, thus furthering the social interests of the local community and local businesses.
5. Tapping the Admiral is listed in the CAMRA National Good Beer Guide, which has a rigorous selection procedure by local CAMRA members.
6. Regular events at Tapping the Admiral include, pub quizzes every Wednesday and Whiskey Mick's folk music every Thursday.
7. There are numerous annual gatherings of various groups for example the "Cheeonaughts", a group of people who have worked in the aeronautical field (pilots/engineers/etc...) They meet at Real Ale pubs and have a cheese competition.
8. Another well known one is the beard society have a yearly meeting at the pub. Approximately 20 hirsute men meet up, drink ale and compare facial hair.
9. Every couple of months there are CAMRA socials and it can range from 5 to 25 people, but they come by the pub at least 5 or 6 times a year. There are of course many others some official and some unofficial.

All these events can and have been happening since 2012 and continue to do so irrespective of the use of the upper parts.

We submit that we have proved above, that loss of the space related to this application does not put the pub at risk and that it can continue to operate successfully. In fact the proof is that the pub has been able to operate successfully without any other accommodation than the current ground floor and it is thriving. The pub upper parts have been derelict for over 12 years and have not formed part of the day to day operation of the pub for at least that period.

Policy 4.8 of the London Plan 2016 draws attention to concerns about the upper floors of pubs being used to provide residential accommodation for occupants "likely to have different expectations of amenity."

Within the proposals this has been considered with sound separation and a detailed acoustic study to further reinforce the adequateness of the proposals. It should also be considered that the pub is in a predominately residential area and housing adjoins and opposes the premises and the gardens to the adjoining premises would be more affected than the units above. Anyone renting an apartment above a pub, must have a realistic expectation of amenity, with separated access and egress and sound separation. This is also covered under the pre application advice section.

Policy C4 criterion (a) Proposals must demonstrate to the council's satisfaction that they would not result in the loss of pubs valued by the community.

- TTA is on the Council's ACV register and as such does not require a community survey.
- The pub has not lost any facilities by virtue of the application and we have listed within this document the facilities and amenities offered to the local community.

Criterion (b) Proposals must demonstrate to the Council's satisfaction that there is no interest in the continued use of the property to site as a public house and no reasonable prospect of a public house being able to trade from the premises over the medium terms.

This does not apply to the current proposals as it is a thriving business and there are no plans to close the pub, therefore a marketing exercise / viability exercise do not apply to this application.

The historic and Architectural value of the pub have been outlined within the design and access statement.

The pub has successfully traded since being returned to business from a 5 year closure by the current operator. It has been turned into a vibrant pub and the lack of upper parts in respect of its operation have had no impact as they are derelict and have not formed part of the pub's core or ancillary accommodation. There have been no staff accommodation, function rooms or meeting rooms while trading as TTA or prior to this. It would seem that the upper parts were let as an HMO and the layout is existing and this is of a residential nature. There are no single spaces big enough for function rooms etc.

CONCLUSIONS

The proposed alterations for conversion and extension of the above site to provide 3 x 2 bed flats for short term market rental purposes Associated with the Public House business are some of the most desired sizes and meet the minimum standards for accommodation and provision. The building although not listed or in a conservation area is a building of note and the extension and alterations to this have been sympathetically designed not to distract from the base building and in line with Councils advice. The mix of units has been selected to further retain and enhance the existing architecture. The scheme should be evaluated on its own merits. The building is virtually the same height apart from a mansard roof set back from the perimeter, therefore the apparent height within the streetscape remains visually unchanged. The extensions compliment the base building. Having reviewed the Core Strategies, Development Policies and supplementary planning guidance the proposals have met these requirements. In terms of sustainability and Carbon emissions the proposals are more effective than the current building.

There are several benefits of allowing this development to proceed, these have been set out above and include a visual enhancement of the site and surrounding area. The provision of 3 residential apartments. At the same time there would be a modest loss in a redundant residential use associated with A4 drinking establishment however this would be offset by the provision of 3 high quality homes bringing back into use derelict space above a commercial premises and reinstating a Heritage asset back to its former glory. Most importantly there is no impact on the A4 drinking establishment which will continue to trade successfully as it has for the past 6 years.

There is a high standard of design that is compatible with the scale and character of the surrounding development and there would not be any unneighbourly impact.

The proposed development represents an excellent opportunity to considerably improve the appearance and integrity of the building to create a high quality / sustainable residential development above and associated with a commercial use, commensurate with the buildings location and stature.

We respectfully request that planning permission be granted.

APPENDIX A – ACV LISTING

APPENDIX B – AWARDS AND ARTICLES

