

Knebworth Parish Council

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9 August 2017

Planning Control
North Hertfordshire District Council,
PO Box 10613
NG6 6DH

Dear Ms Poyser,

Planning Application (Reference No. 17/01622/1)

Development at the Station Public House, Station Approach, Knebworth SG3 6AT

Introduction

1. These comments are made by Knebworth Parish Council to North Hertfordshire District Council in response to a planning application to redevelop the Station Hotel at Station Approach Knebworth (LPA reference No. 17/01622/1). The description of the proposal is as follows:

"Erection of 3 storey building to provide 9 x 2 bed flats and erection of 1 detached dwelling. Re-modelling and refurbishment of existing public house including 4 x 1 bed flats above including new vehicular access off of Station Approach."

2. The Parish Council has carefully studied the planning application and the accompanying documents, and has been made aware of the strong views in the community about the proposals. The response of the Parish Council is set out in the ensuing paragraphs.

Planning Considerations

3. From its review of the proposals, the Parish Council believes that there are five main sets of issues which need to be considered by the District Council in the determination of the application. These are as follows:
 - the amount of development in the form of flats
 - the density of development on the site
 - highways and access
 - the loss of the public house in its existing form
 - visual impact

These issues are considered below, with the recommendations of the Parish Council.

The Amount of Development

4. The Parish Council has become increasingly concerned about the potential numbers of flats, both with planning permission and proposed, in the centre of Knebworth. In particular, there has been a build-up of development pressure in the vicinity of the railway station. Planning permissions have been granted for developments at the Station House in Station Approach (LPA reference 16/03262/1PN) and the land between the station car park and Ferguson House in Park Lane (LPA reference 17/0083/1). If permitted, the development of the public house site would take the total number of flats to 50 units within 50 metres of the railways station.
5. Elsewhere in the centre of the village, the current doctor's surgery at the junction of Stevenage Road and Station Road has permission for eight one-bedroom flats. At No.111 London Road, there are 26 flats for the over sixties; at the rear of the Co-op supermarket, there are 23 flats for the over-55 age group. Added to these totals, there will be a planning application for the redevelopment of the Chas Lowe site, which is likely to consist of 48 units for the over 70's.
6. Cumulatively, these developments will fundamentally change the character of the village, leading to an overall loss of amenity and increased pressures on local infrastructure and services. In particular, the concentration of flats near the railway station will bring additional problems of traffic congestion and road safety, as outlined below.

Density of Development

7. The Design and Access Statement (paragraph 73) states that the development will contribute to the open space provision as required in the Local Plan. It is difficult to see how this could be achieved when the applicants propose to cover the garden area with a large block of flats. Clearly, the proposed development would substantially increase the overall density of the site. The public house, which is a detached building, would be dominated by the proposed apartment block. With the loss of car parking and open space around the existing building, the character of the public house and its surroundings would be irretrievably damaged.

Highways and Access

8. With the potential rise in the numbers of flats in the vicinity of the railway station, the Parish Council has been increasingly concerned about highways safety and access. The area around the application site is already congested at peak travel times. Rail passenger numbers at Knebworth station have increased by over 70% in the past ten years, and the station car park is extremely busy.

9. Traffic is at a standstill on Park Lane at peak times, with car passengers being dropped off or picked up at the station. At the same time, vehicles are unable to access the station car park. Congestion also develops when the school bus parks on the bend outside the station, or when delivery vehicles are parked.
10. There is limited highways capacity beyond the station itself. To the south there, there is a blind bend in the road, and a narrow bridge under the railway. To the west runs Park Lane (C29), the main link from the village to Old Knebworth and beyond. Park Lane itself has limited car parking availability, with double and single yellow lines. The result is that day time parking by rail commuters is spreading further into residential areas, in turn leading to more congestion and loss of amenity.
11. The proposed development can only exacerbate the existing problems outlined above. There is no Transport Statement accompanying the planning application, and the Design and Access Statement is inadequate in its consideration of highways issues. Two new accesses are shown on the submitted plans; these are opposite the railway station and on the bend in the road. These accesses are clearly unsafe, given the level of conflict which already exists.
12. In these circumstances, it is significant that Hertfordshire County Council Highways have raised an objection to the proposal on safety grounds (email of 18th July 2017). The Parish Council supports this objection, and wishes to raise a number of more detailed points.
13. Vehicle parking on the site plans is mixed between the allocations for the public house and the proposed flats, appearing to show a total of 30 spaces. It is clear that car parking on the site is inadequate and does not comply with the District Council's parking standards. Existing parking associated with the public house is already cramped. When, in 1984, the District Council granted planning permission for the building of a conservatory, there was a condition requiring the provision of 25 additional car parking spaces. That part of the site was subsequently sold by the owners, and planning permission was granted for eight flats (now Wordsworth House).
14. Although the applicants propose to retain a public house on the site, there are no specific proposals for deliveries to the premises. The Parish Council is concerned, therefore, that brewers' drays and other delivery vehicles would be forced to park on the public highway in an already congested area. In addition, Station House has its parking provision off Kerr Close, so that any deliveries for that development will park immediately opposite the proposed entrance to the flats above the public house.
15. The District Council is seemingly aware of the potential problems. The Parish Council notes that the original application for the development at Hamiltons (LPA reference 17/0883/1) proposed a 50% reduction in the required parking provision. Consequently the District Council refused the application, which resulted in a reduction in the number of dwellings and compliance with parking standards.

The Loss of the Public House in its Existing Form

16. Following the acquisition of the site, Market Homes Limited has closed down the public house. Perversely, the Design and Access Statement states that this is a “positive application”, designed to use a “redundant site”. This is a ridiculous statement, in that the applicants, by closing the public house, made it redundant. The developers are obviously aware of the reaction from the local community and the speculation about the permanent loss of the hostelry. The Parish Council shares these concerns and acknowledges the campaign being run by the Save Our Station Pub (SOSPUB) group in the village. As the only public house in the village, the Station is clearly a centre of community activity, as evidenced by the SOS campaign material. This has been endorsed by the District Council, which has designated it as an Asset of Community Value (ACV).
17. The Parish Council notes that the proposed development includes the retention of the public house, but as a reduced operation, with a smaller overall site area. The Design and Access Statement alleges that the development “will facilitate” a viable pub, but there is no evidence to support this. It is a fact that the ACV designation applies to the whole site, which includes the popular beer garden and the petanque piste. There is widespread concern in the community, therefore, that the reduction in the site area and the potential level of activity would make the entire business unviable. If this happened, followed by closure, the only public house in Knebworth would be lost. Clearly, in a large village of over 5,000 people, this would be devastating.
18. There are a number of factors which give reason for concern. The poor access and reduction in car parking have been mentioned above. On the application form (question 18), it is stated that there is no change of use of non-residential floor space. The first floor space above the public house, however, was tied to its A4 use, and was used as the accommodation for the landlord. In the plans as submitted, there is no provision for the accommodation of a manager and his or her household.
19. It is assumed from the application that the public house will stay open late and run music and entertainment events. In those circumstances, the Parish Council considers that the change of use of the upper floors of the building to separate flats is not a satisfactory environment for the potential occupants of those units.
20. In the view of the Parish Council, the whole of the public house site (designated as an ACV) should be retained. For many years, there has been widespread concern about the loss of public houses in the UK. The government has recognised this issue and in May 2017 introduced secondary legislation to protect public houses via the Town and Country Planning (General Permitted Development) (England) (Amendment) (No.2) Order 2017. Basically, this removes permitted development rights for the change of use from Use Class A4 (drinking establishment) to Use Classes A1, A2, or A3. Without this provision, it is doubtful whether the Station would have been retained as part of the planning application.

21. Even before the introduction of this legislation, there have been many cases where local planning authorities have been successful in preventing the loss of public houses. The National Planning Policy Framework (NPPF) paragraph 28 states that local plans should promote the retention and development of local services and community facilities in villages, including pubs.
22. North Hertfordshire District Council itself has recently been successful at appeal (Reference APP/X1925/W/16/3154355) in preventing the redevelopment of the Fox and Hounds public house at Barley for residential purposes. Despite the fact that this was not the only public house in Barley, the Inspector considered that its loss would reduce the community's ability to meet its day-to-day needs. There are a number of similar appeal decisions which have been made recently on these grounds. In Hertfordshire, East Herts District Council won appeals against their refusal to grant changes of use of rural pubs to dwellings – at the Grandison Arms in Bramfield, and the Golden Fleece in Braughing. Both establishments are now thriving businesses, and have diversified as food outlets.
23. In the Submission Local Plan, the District Council has approved a policy ETC7 which seeks to protect scattered local shops and facilities in towns and villages. This includes public houses. The policy states that planning permission will be considered for a change of use if there is a similar facility within a reasonable walking distance. As the Station is the only pub in Knebworth, there would be a presumption against its redevelopment. At the Barley appeal, in November 2016, it was agreed that policy ETC7 could be given little weight in the decision. Now that the Local Plan has been submitted, it can now be given some weight in planning decisions, especially as policy ETC7 has a degree of public support.
24. The NPPF paragraph 70 states that planning policies and decisions should guard against the unnecessary loss of valued community facilities, particularly where this would reduce the ability of a community to meet its day-to-day needs. From the SOS campaign and the public reaction to this application, it is clear that the Station is a valued community asset. This endorses its designation as an ACV.
25. Although the applicants have stated their intention to retain the main body of the public house, the Parish Council share shares the acute public concern about the loss of the site as a whole. Together with the other issues set out above, it is considered that the application should be rejected.

Visual Impact

26. Historically, the Station Inn, opened in 1883, is linked to the Victorian expansion of the Great Northern Railway. It is not a Listed Building of Historical or Architectural Interest, but it is significant in terms of its contribution to the character of Knebworth. In recognition of its local status, the public house and its out-building have been identified as a "building of interest" on the District Council Register.

27. The integrity of the building and its relationship to the surrounding area is derived from the fact that it is detached from nearby properties and has some status in the street scene. In the North Hertfordshire Register of Buildings of Local Interest, it is stated that the railway station (opened in 1884) "is important locally and is a significant building in the historic development of the town. The Station Inn and Knebworth Station forms a distinct pair and are two of the earliest buildings to be built in Knebworth."
28. Positioned opposite the railway station, the Station Inn is therefore a well-known point of reference for local people and visitors, and is held in some esteem. Among the attractions of the pub are the beer garden and the adjacent pétanque piste, both of which are well-used. The proposed developments would lead to the removal of these facilities. In terms of their scale and form, the proposals, particularly the three-storey block to the west, would dominate the site and the existing buildings, diminishing the visual impact of the pub and its out-building in the local street scene. The developments would also lead to the loss of a mature lime tree in the centre of the site.

Other Comments

29. In addition to the points made above, the Parish Council wishes to make the following comments:
- (1) The footpath, referred to in the Design and Access Statement as "illegal" has in fact been used by the public as of right for over 20 years. Evidence of this as an established pedestrian route is provided by the paving slabs, which were laid on the site and were salvaged from the former Deanscroft House.
 - (2) There are concerns that, if the public house becomes a leasehold property with very limited outdoor space, it will struggle to survive.
 - (3) Answers to questions 2 and 3 of the Planning Application form state that development has not started. The response to question 15 states that there are no trees or hedges on the site. Both these answers were factually wrong. In mid-July, it was clear that preliminary work had commenced on the site, including the removal of the prominent lime tree in the centre. The garden area is fronted by a hedge.
 - (4) The response to item 7 states that arrangements for commercial wheelie bins have been made, but this is not apparent on the submitted drawings.

Recommendations

30. For the reasons set out in this statement, Knebworth Parish Council very strongly objects to the planning application (LPA reference 17/01622/1). The Parish Council recommends that North Hertfordshire District Council should refuse the application on the following grounds:
- (a) The proposed development, consisting mainly of residential flats, is excessive in terms of the additional numbers of small units in the centre of Knebworth, which would harm the character of the village and exert pressure on local facilities and services to the detriment of local amenity. The development is contrary to the guidelines in policy 57 of the North Hertfordshire Saved Local Plan 2007.
 - (b) By reason of its density, scale and form the proposal constitutes over-development of the site, contrary to the guidelines in policy 57 of the North Hertfordshire Saved Local Plan 2007, policy SP9 of the Submission North Hertfordshire Local Plan 2017, and the Design Supplementary Planning Document 2011.
 - (c) The proposed accesses to the site are dangerous in terms of their location on the bend in the C29 road opposite the railway station. The development is therefore contrary to the NPPF paragraph 35, the DfT Manual for Streets (paragraph 7.8.3) and Hertfordshire: A Guide for New Development.
 - (d) Car parking for the proposed development is inadequate and fails to comply with the North Hertfordshire District Council Supplementary Planning Document: Vehicle Parking at New Development 2011.
 - (e) The reduction of the operational area of the public house reduces the ability of the community to meet its own day-to-day needs, contrary to paragraphs 28 and 70 of the NPPF and policies ETC7 and SP10 of the Submission North Hertfordshire Local Plan 2017.
 - (f) The visual impact of the development is over-dominant and is harmful to the setting of the Station Public House and its relationship to the surrounding area. This is contrary to the guidelines in policy 57 of the North Hertfordshire Saved Local Plan 2007, and policies SP10 and SP13 of the Submission North Hertfordshire Local Plan 2017.
 - (g) By reason of the loss of an A4 site, registered as a community asset, and re-designation to C3 usage.

Conditions

31. Should North Herts District Council decide to grant the application, the Parish Council requests that:

- (1) A condition is made to ensure that the four flats above the pub will not impact on the opening hours of the pub or activities associated with it.
If this is considered unreasonable or unenforceable then the viability of the proposed pub must be questioned.
- (2) There is provision for affordable homes in Knebworth.
- (3) A contribution is made towards community halls.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Claire Graham', written in a cursive style.

Claire Graham

Clerk to Knebworth Parish Council