



Ref: S/1862/08/F

Site Location: Red Lion Hotel, Station Road East, Whittlesford

This note is the formal response to the comments put forward by Corrie Newell, Conservation Officer at South Cambridgeshire District Council, in her letter of 16 January 2009, in regard to the revised planning application for a new hotel accommodation building at the Red Lion Hotel, Whittlesford. This response has been informed by comments submitted by Charmain Hawkins of Beacon Planning Ltd as Heritage Consultants to the project.

In direct response to the Conservation Officer's comments upon the application it is important that the following points are taken into account:

Setting and significant views

- The Heritage Significance within Views supporting documentation for the application shows that the existing vegetation to the embankment to the A505 will not be removed – given this is outside of the application site. The trees within the application site are generally poor quality fruit trees which will be replaced with a higher quality landscaping scheme. The enhancement works to the area adjacent to the southern elevations of the hotel and chapel including hard and soft landscape works will create a significant enhancement to the setting of these buildings which will be visible in the passing views from the embankment. English Heritage in its response has acknowledged the importance of these improvement works.
- With regard to the vegetation to the western side adjacent to the platform. This is of limited value as View 9 shows this is largely shrubs and plants rather than mature trees. The Heritage Assets are not visible from either of the railway platforms due to the effective screen of the railway structures and the vegetation. The replacement of the planting with a solid structure will not therefore lead to any loss of views to the heritage assets. There has not been any objection raised in the negotiations undertaken to-date over the last 12 months to the loss of the trees to this boundary. It should be noted that Network Rail is fully supportive of the removal of the trees and shrubs to this boundary due to the maintenance and safety issues they raise in relation to the railway line and station platform.

The contribution of this boundary planting to the setting of the Heritage assets is assessed to be low. It is argued that the proposed environmental improvements to the immediate setting of the Listed Buildings where the current car park and refuse storage is currently located will have a far greater positive impact on the setting of the Listed Buildings. The enhancement works will remove the vehicles from the immediate setting of the buildings and create a high quality hard and soft landscaped area in which the group of buildings can be viewed and appreciated safely.

- The main public view points for the heritage assets of the hotel and chapel are along Station Road east and the railway bridge. It has been fully demonstrated that the proposals will have no impact on these key vistas. The weight attributed by the Local Planning Authority of the views from the A505 is questioned given that there is no pedestrian pavement or cycle track here and thus the main receptors are people in vehicles travelling at speed and thus the views are only fleeting ones.
- It is disputed that there is 'woodland' on each side of the site. The only group of trees which are considered to qualify for this status are those to the south of the A505 and thus unaffected by the proposals. The trees on the western side of the railway line total approximately 10 trees which are reinforced by shrubs and creepers including ivy and conifers to the domestic gardens behind the bank area. To the eastern side of the site is a line of tall conifers which separate the site from the station car park. None of these trees are affected by the works and thus will still be viewed when travelling on the A505 as a backdrop to the site. When travelling from the west it is the parapet wall of the railway bridge which immediately comes into view before passing the site.

When travelling by train north toward Cambridge the railway bridge also forms the distinct break from the open countryside to the south and the industrial and built up area of Whittlesford Bridge. The development it is argued would form part of the existing built settlement and not be visually incongruous with its setting.

Enabling Development

- From the outset the applicant has always been up front and explained that these proposals are part of a two, possibly three, phase development for the site. As it is a small family run business they simply do not have the money and cannot secure the finances to undertake the works as one package. For this reason Phase 1 has been submitted with the Red Lion Hotel excluded from the red line. There is no ulterior motive to this. The notion that the Red Lion will not be invested in or will be sold off separately is totally ill founded. Firstly the sites share parking and servicing and it would therefore be extremely difficult to separate the units. Secondly the choice of franchise is one where there is a synergy between the existing and proposed buildings such that the hotel will provide the majority of food and beverage and meeting room facilities. The Council has been provided with details of the terms of the franchise to show that this requires the Red Lion to be run at a required standard to complement the new hotel. This will require refurbishment of the Listed Building. The applicant has indicated that Phase 2 is likely to entail some alterations to the current building to accommodate the staff quarters, meeting rooms, improved kitchen and dining facilities. However this stage cannot be contemplated unless Phase 1 is secured.
- The Local Planning Authority has sought to raise the issue of seeking to secure investment in the historic building on the back of the new works. This has been taken to be enabling development, as the rationale for seeking new development is to secure a sound economic basis for the existing building into the future. The new works in effect enable the refurbishment works/repair and building works to occur. In prior meetings the delicate balance of how the funding for each stage has been outlined. The applicant has had to provide a wide range of supporting specialist reports for the new build. The costs of providing detailed plans and supporting documentation with regard to the Listed Building simply cannot be entertained until consent is achieved for the new build. This step of the process have not been commenced as it represents a significant amount of work and costs over and above that undertaken for the new build scheme which would all be abortive if the new build is refused.
- However in order to give the Local Planning authority a degree of comfort the applicant has undertaken both a Historic Building Analysis and a Condition Survey of the existing building which form the basis for any future works.

The Condition Survey has always intended to offer an assessment of the existing building and identify areas of repair for the existing fabric. It has never been presented or purported to be a report setting out the restoration of the building. A detailed drawn scheme with a schedule of works would form part of the Phase 2 application. This level of detail was accepted in pre application negotiations as a means of addressing the concern over the investment into the Red Lion. The figures quoted indeed reflect just repair and maintenance measures rather than a refurbishment and have never intended to be anything else. If the Council are seeking further detailed information at this stage it is argued that this is unreasonable and totally at odds with the discussions held with Officers to date.

- The new build is presented as the only realistic viable means of retaining the present business and current hotel/food and drink use of the site. The supporting information provided by King Sturge has outlined why the location of the hotel, adjacent to a railway line, main road and industrial estate is limiting to how the present use can be developed. The retention of the Listed Building in full economic use and a proposal which allows much needed investment into this building is fulfilled by the proposals. The option of retaining the building as it is, is not a realistic

one as stated in the supporting statement. The applicant has been refused funding to upgrade the building as it stands. The new build scheme brings with it high guaranteed occupancy rates and a higher constant level of people needing food and beverage to ensure the future of the Red Lion. One can point to an increasing number of pub/hotel closures including the nearby George at Barbraham – a Listed Building offering pub and dining facilities refurbished in the last 5 years.

- The scheme has the full support of the East of England Tourist Board and East of England Economic Development Agency. The proposals meet a particular gap in the market for the area. The applicant has had a detailed business plan and business analysis undertaken prior to submitting the application to look at alternative ways of supporting and developing the business. It is maintained there is no other viable or sustainable option which would retain it as a pub/inn facility serving both the local community and providing quality budget accommodation to visiting guests.
- If the Council is seeking an alternative use to be found for the building, this alters the agenda of the discussions considerably. In the meeting held on 11 September 2008 categorical support was given by Officers from SCDC to a 70 bedroom hotel development on the site. It is questioned why this support apparently now seems to have been rescinded.
- It is questioned whether any conservation body would offer any grant aid to support a commercial activity on the site in the support of a hotel business. This would be contrary to the terms of reference for most bodies who offer grants. The current proposals are not seeking any grant aid and would result in private capital being invested in the site as a whole and not public funding.
- Whilst it is accepted and clearly forms a major part in the applicants' case that the site is within development limits, it is questioned that the development is viewed by the Council as being in accordance with the development plan. Clearly in refusing the first application the Local Planning Authority have been of the opinion that the scheme is not in accordance with the development plan being contrary to Policies CH/4; DP/ and DP/3. Having had regard to the English Heritage document, 'Enabling Development and the conservation of significant places' 2008, this document states in seeking to define enabling development:

Enabling development that would secure the future of a significant place, but contravene other planning policy objectives, should be unacceptable unless:

- a it will not materially harm the heritage values of the place or its setting**
- b it avoids detrimental fragmentation of management of the place**
- c it will secure the long-term future of the place and, where applicable, its continued use for a sympathetic purpose**
- d it is necessary to resolve problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid**
- e sufficient subsidy is not available from any other source**
- f it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests**
- g the public benefit of securing the future of the significant place through such enabling development decisively outweighs the disbenefits of breaching other public policies.**

It is argued the proposals meet all of these criteria and it is noted that the reference is to 'planning policy objectives' and not whether a site is within development limits or not. Clearly the Local Authority currently considers the proposals to be contrary to some of the policy objectives of the adopted LDF and therefore the provisions of this policy guidance are applicable.

- It is argued the Local Authority cannot seek to both control the inter-linkage of the new build and the future of the Red Lion building and deny the development is not enabling development. There is no consistency of logic or argument to this. The Council appear to be arguing in their last paragraph of this section that the control of the linkage between the new build and works to the Red Lion cannot be not sought, therefore the second schedule of the unilateral agreement tabled as part of the proposals- which covers the repair works as set out in the condition report tabled to be auctioned by the applicant within an agreed time period – will be deleted and the agreement shall only cover site highway works (Schedule 1).

Design and Access Statement

- It is maintained that the concerns raised on the design, mass and scale of the building have sought to be addressed by amendments to the scheme. The reduction in the number of rooms was achieved by a special dispensation being secured from the franchise company to allow this. They have indicated no further reduction could be entertained or the scheme becomes unviable.

The meeting held in March 2008 was in advance of the detailed survey results with spot heights and thus the reference to levels was in relation to the completion of this work. It is only since the submission of this application that any notion of digging down one storey has been sought by the Council or English Heritage. In the meeting held on 11 September 2008 where the setting down of the building to the current application level was tabled it was made clear that to lower the building any further would raise issues with disabled access, the general circulation on the site, parking arrangements, lighting to rooms and the construction costs.

The width of the building has up to this point in time not been raised as an issue. In seeking to reduce the scheme to a single room and corridor width the proposals then take up a far greater portion of the site and as has been demonstrated would be far more intrusive and harmful to the setting of the Listed Buildings as they would result in a long wing parallel to the A505 or by intruding on the street scene of Station Road East. This would result in the loss of on site parking and thus the scheme is likely to be resisted on grounds other than design. Such measures also significantly increase the build costs and make the viability of the scheme questionable.

- It is maintained that the other options raised by the Council and English Heritage have been explored to a reasonable degree to demonstrate they would be far more harmful than the current scheme. At the meeting on 11 September 2008 a fly through programme was shown to Officers. As a result of the evidence presented at this meeting and the positive feedback given to the current application scheme given the reduced height of the proposals this scheme was formally submitted as a resubmission. It is therefore disappointing that more negative responses and new objections are being raised given the length of time spent discussing the proposals and the considerable efforts made to both address the concerns and justify the current scheme.

The proposals are the optimum scheme when all material considerations are balanced and the Local Planning Authority should respect this in their consideration of the proposals.

27 January 2009