

**Nash Mills Parish Council met on 11<sup>th</sup> September 2017 and considered application: (4/01679/17/MFA | ROOF EXTENSION, REFURBISHMENT AND REPAIR AND USE OF BUILDING AS 10 FLATS).**

NMPC Councillors were appalled that the Nash House building has been allowed to decay so badly. There appear to be, planning conditions attached to the decision notice for application 4/01382/09/MFA which requires the Developer to agree a time schedule for the rebuilding/refurbishment of Nash House and other construction works. This condition has not been complied with and NMPC would like to know why this situation has been allowed to develop, that did not ensure developers would be held to their original plan to refurbish this important and historic landmark in our community.

Councillors **strongly object** to the proposed new development on the following grounds:

**CONTRARY TO PLANNING POLICY**

The proposed change of use application, as currently proposed will be contrary to local planning policies of the Core Strategy Development Plan Document (DPD), the principle document of the Local Planning Framework, adopted by Dacorum Borough Council on 25 September 2013; in particular the adopted policies of Core Strategy CS23, which emphasises the importance of:

Quality of Design for both the public realm and built environment

Strengthening economic prosperity by providing spaces for offices and supporting retail and commerce

Meeting community needs by delivering community services and facilities and delivering leisure facilities

Conserving the historic environment and the effect of changing the historic building, which forms a significant part of the local character

**OVER-DEVELOPMENT**

The change of use of Nash House, to allow additional residential units, will lead to an adverse social impact on the residents of the Nash Mills development and the wider local community, as there will be no social facilities or amenities formed within the boundaries of the development. If approved, this would be contrary to the councils' adopted policy CS23 and the original developers' public declaration and principle aims for the development, which state:

*'Nash House is a key part of the overall development and is the heart of the scheme. The proposal would retain this building and make a focal point for the future community of the site and the surrounding area.*

The conversion of Nash House to additional residential units which seeks to include an unwelcome substantial addition to the existing footprint on what is already a high density development. This will lead to an adverse visual impact on the character and setting of the local area, requiring additional parking spaces formed upon the site, further eroding the important 'green spaces' of the Nash Mills development.

The proposal to provide additional residential units within the Nash Mills development site will cause overdevelopment and overcrowding of the Nash Mills site, due to a proposal to further increase the population density and an according increase in parking provision within the development and cause a further increase in vehicular traffic within the wider area, which is already a clear problem for local residents.

The proposed lay-out of the ten residential units illustrate very small, cramped living areas indicative of overdevelopment.

### **CONVERSION OF THE HISTORIC HOUSE**

Nash House was, at the time of the original planning application and occupation by the developer, a building that was in use and one which retained a unique and important architectural structure, finishes and fittings. Though the property required extensive maintenance and refurbishment it appears that the developers took it upon themselves to strip the building completely of all structural materials, coverings, protective surfaces, finishes and fittings, leaving the remaining structure in poor condition. By doing so, the developers' have a moral obligation to the local community and a legal obligation under the conditions of the planning approval and subsequent approvals, to return Nash House back to a habitable condition for community use. Nash Mills Parish Council would like Dacorum Borough Council to request that the developer commission a comprehensive structural survey to ensure the building as it remains is structurally safe.

This historic house is important to Nash Mills' history and any sensitive design would incorporate some mention of its history within the development.

### **MARKETING & COMMERCIAL VIABILITY**

The property has been marketed by local agents over recent years, but only in the unsafe and un-inhabitable condition that it was left in by the developers', following the granting of approval of the Nash Mills development.

Due to the high costs in returning Nash House back to a habitable building, regardless of use, these costs alone would be prohibitive to any community or small commercial use. Therefore we feel that the building has not been properly marketed in a genuine and viable manner, for which the planning guidelines on marketability of a property would relate. We feel sure that an appeal inspector would concur that the marketing of this important local property must be carried out in a genuine and meaningful manner, which has not been demonstrated with this application.

The relatively low levels of financial contributions of rent etc. cited by the developer as a reason to exclude community use and occupation of the building are not grounds to exclude community uses from the site. It is specifically written into local and national and planning policies that community uses should be both encouraged and supported in developments where possible. This has not been demonstrated as noted above.

It is acknowledged that few, small -scale, commercial and community groups could raise finances such as to enable the reinstatement of Nash House, we therefore feel that the property must be reinstated as a viable, habitable property, ready for occupation and use for it to attract any genuine and meaningful offer.

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The value of Nash House is clear to the community and also acknowledged by the developer in their public statement as part of their initial public consultations as noted above; that the value of Nash House is not limited to the financial cost of reinstatement of the property, but in its wider, long-term community use as an important heart and hub, both for the Nash Mills development and wider parish of Nash Mills.

Where community support services are not provided within large-scale residential developments, there is a clear and demonstrable lack of balance between public and private spaces, which result in the ghettoization of an area over the medium to long term. It for this fundamental reason that community projects and public spaces are provided, to ensure that a community retains a properly balanced and well-proportioned sense of public and private space, the requirements of which are detailed within both local and national planning policies.

### **COMMERCIAL AND COMMUNITY USE**

We appreciate that the relatively small scale of the property footprint, will typically exclude a 'convenience store' type use, for the reasons defined within the developers planning Statement of Support, however, it is important to recognise that the developer has sought to and obtained permission to change the use of the principal retail units of the Nash Mills development. Nash House was not proposed to perform the service of a dense, retail use of the Nash Mills Development, but to provide a space for community and business use, by way of smaller non-intensive (coffee shop) retail use and small business development opportunities, forming, as defined by the developer, a mix of uses at 'the Heart of the scheme'.

The developers consulted the public prior to the issue of the development planning approval and confirmed:

***'After careful review of existing community facilities and listening to the aspirations of local stakeholders, it is proposed that Nash House will incorporate 'a' mix of uses'.***

Local stakeholders have not been consulted on these new revised proposals to remove all community and retail opportunities from the Nash Mills development and the community facilities that the developer had carefully reviewed at the outset remain as they were prior to the granting of the development planning approval. The public consultation formed a key aspect of the original development plan and subsequent granting of approval.

The developers have suggested in their planning Statement of Support, that any commercial use for Nash House would be difficult to let and unsustainable in the longer term. The nearby developments of both Dickinson Quay and The Ovaltine development, both have vibrant, well supported and flourishing retail units combined within the fabric of their developments.

Dickinson Quay provides two restaurants, a public house, coffee shop and local convenience stores, all of which have been in operation for many years and continue to be fully supported by the residents of the development. The lack of street-frontage and parking provision to these units means that they are principally supported and well patronised, by residents of the development, rather than being reliant upon passing or trade from the wider surrounding community. We do not feel this an appropriate ground for supporting a change of use application.

The developers have suggested in their planning Statement of Support, that finding a low-density commercial use, such as a coffee shop, would be difficult due to the architecture of

the building. Many successful low-density retail units, such as coffee shops exist within the fabric of historic buildings, the form and style of the building does not deter people from using these facilities, where they are presented. The units of Dickinson Quay have large floor to ceiling windows and their facades are set back behind canopy roofs with large quay-style arches. We do not feel this an appropriate ground for supporting a change of use application.

### **PLANT AND AIR EXTRACTION**

Air extraction within historic buildings must be given due consideration and a considered design should form an integral part of the recommissioning of Nash House. Whilst the use of external extraction units would not generally meet with the support of the conservation department, internally formed and attenuated extraction can easily be accommodated within the development, as with many other historic buildings that have been converted throughout the country. We do not feel this an appropriate ground for supporting a change of use application.

### **SIGNAGE**

Signage for the new retail and commercial uses of the development would need to be proportionate, well designed and considered. Many examples of good and proportionate signage are in existence on historic buildings. The developers have suggested in their planning Statement of Support, that a lack of road-frontage signage would be detrimental to the use, operation and overall future viability of any commercial use of the building; however as defined above, the vibrant and long established commercial units of the neighbouring Dickinson Quay development have succeeded without the need for road-front signage. We do not feel this an appropriate ground for supporting a change of use application.

### **ACCESS**

The developers have suggested in their planning Statement of Support, that level differences between the external ground level and finished floor would be an issue for the conversion of the property to a commercial use. Though Nash House has steps as the principal entrance access, considered design will allow the addition of ramped access by way of considered external gradient landscaping, a feature that if designed correctly, would we feel be supported by the local conservation officer.

If the application for change of use to residential units were to be approved, the new residential units would also require level access between the site and ground floor of the property, in order to achieve current minimum Building Regulation Standards. We feel this suggestion is a like-for-like argument and one that is not appropriate grounds for supporting a change of use application.

We do not feel this appropriate ground for supporting a change of use application.

### **LOCATION**

The developers have suggested in their planning Statement of Support, that the location of Nash House within the heart of the development would not attract a commercial business,

however, as noted above, the vibrant commercial units of the neighbouring Dickinson Quay prove this to be quite the opposite. The continued occupation of the retail units of this development over many years and the support from the surrounding residents proves that where these units are formed and included within a development, they are well-supported and much needed facilities for local residents and give a genuine sense of community and heart to a development. The importance of these public spaces is an important aspect of large residential developments as defined and supported by both local and national planning policies.

We do not feel this an appropriate ground for supporting a change of use application.

### **PARKING**

The developers identify in their planning Statement of Support, that a lack of parking for commercial use is a reason for allowing the change of use.

The parking and traffic flow about the site is exceptionally difficult and causes problems for the wider community beyond the boundaries of the development. Providing additional residential units upon the site will compound the long established problem further.

It can be seen that where community uses and low-density retail opportunities are provided within a development, these do not increase parking within the site as these units are not reliant upon passing or external trade to support their operation. Their support comes from the residents of the development and immediate surrounding areas, whose vehicles are by and large, already parked on or about the site. This can be seen in both the neighbouring Dickinson Quay and Ovaltine developments, neither development providing dedicated parking for the commercial units.

We do not feel this appropriate ground for supporting a change of use application.

### **CONCLUSION**

The application for change of use of this important building can be seen to be contrary to local and national planning policies.

The application fails to take account of the developers own '*careful review of existing community facilities and the aspirations of local stakeholders*'.

The application ignores the historic importance of the building and makes no reference to any plan to mark this in any way.

The application has generated an unprecedented level of local objections through the public consultation of the application, demonstrating the proposal is not reflective of local needs and opinions.

If the Borough planning department are minded to recommend approval of this application, we would ask that the application be referred to the Dacorum Parish Planning Committee for determination.

Furthermore, DBC should seek changes to:

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1. Eliminate the over-bearing building extension proposed;
2. Seek to reduce the number of small cramped residential units to allow more acceptable living standards for new residents;
3. Seek an enhanced landscaping scheme for Dickinson's Square. Consider eliminating the four parking spaces indicated to the west boundary of Dickinson Square which would enhance the setting of Nash House and the square. (Note: These four spaces are indicated as available to the users of Nash House but are shown as located outside of the application site. This parking provision needs clarification).

Nash Mills Parish Council feel strongly that the aim set out by the original developer recognising this building historic importance should be honoured notably:

"The aim has been to create a sensitively designed development that offers the Nash Mills Community a high-quality and attractive environment in which to live, work and relax. The site's waterfront will be opened up to the general public for the first time whilst existing key features such as the War Memorial, Nash House and Stephenson's Cottage will be retained and refurbished".

To date, the majority of these aspirations have not been achieved. Waterside access is limited, Stephenson's Cottage is being used partially for residential use, and Nash House is a ruin.