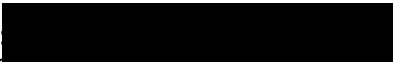


From: Paul Grenfell [mailto:
Sent: 17 October 2018 17:03
To: Prior, Andrew; clerk@hfspgroup.org.uk
Cc: Mark Haslam
Subject: Lamb Inn Appeal - CAMRA submission

Please see copy attached of CAMRA submission on the appeal at the Lamb Inn, Stoke Prior.

This has been sent to the Planning Inspectorate this afternoon.

Best regards
Paul Grenfell

Herefordshire CAMRA

APPEAL SUBMISSION BY HEREFORDSHIRE CAMRA

THE LAMB INN, STOKE PRIOR, HEREFORDSHIRE HR6 0NB

Planning Inspectorate ref: APP/W1850/W/18/3199884



Herefordshire CAMRA, as an interested party, seeks to comment on the appeal against the earlier refusal by Herefordshire Council for planning permission to convert the Lamb Inn at Stoke Prior, Herefordshire HR6 0NB into a private dwelling. CAMRA wishes to support the council's original decision to refuse permission. There are FOUR grounds for doing this:

- 1.) Commercial non-viability not proven
- 2.) No marketing of the property as a pub business
- 3.) Interest from other parties who wish to run it as a pub business
- 4.) Long term harm to the economic and social well-being of the local and wider community

In support of the original planning application is a "Change of Use & Business Appraisal" document authored by a Mr S.G. Culverhouse. There are a number of claims made in this piece of work that Herefordshire CAMRA wishes to take issue with:

1 COMMERCIAL VIABILITY NOT PROVEN

- 1.1 Included with the original application (and the accompanying report) are figures that state the trading losses of the present owner from when the pub was open and trading. CAMRA has no issue with taking these figures at face value. Moreover, it is acknowledged that (for the period shown) that the present owner's pub business was not profitable.
- 1.2 However, it is important to not just take into account the financial circumstances of the current owner in seeking to determine the likely long term structural viability of the Lamb Inn as a business. Different operators, who are likely to have different business plans and financial resources, need to be given an opportunity first before considering an alternative use. Ultimately the true test of viability is whether or not another operator is willing to take the business on. (the marketing of the Lamb Inn is covered in Section 2 of this document).
- 1.3 The same report states that there are no certified accounts for the various pub operators who preceded the current owner. However, what is not in doubt is that the pub has operated successfully over a considerable length of time.
- 1.4 The report sets out some theoretical "trading accounts" for recent missing years, created by the author by using various historic statistics and data sets from the national licensed trade. Whilst this might have been an interesting academic exercise for the author to undertake, it is not by its very nature a reflection on the reality that actually existed. CAMRA takes the view that such an exercise offers little value in making an objective assessment of a pub's past economic viability. This analysis is no more than educated guesswork and should be treated with extreme caution. To be objective in any assessment one needs the real facts and

figures: a profit and loss ledger surely needs to have the ACTUAL costs and revenues for running the business to be meaningful and informative?

- 1.5 It is acknowledged that the pub did have a relatively turnover of a number of licensees prior to the current owners buying the premises. During this time the pub will have been owned by one of two national Pub-owning companies – *Punch Taverns* and, latterly, *Admiral Taverns*.
- 1.6 The business model operated by the pub-owning companies (including these two companies) is typified by a high turnover of operators. Much has been written in various trade journals regarding their high leasehold charges; high wholesale prices for beer (and other consumables), and the need for the leaseholder to sign up to an onerous self-maintaining lease. These operations will have had higher running costs *per se* and will, therefore, have been operating at a commercial disadvantage from the outset in relation to competing pubs that were not owned by pub companies.
- 1.7 The elephant in the room here concerns the ambitions of the local Parish Council to take ownership of the Lamb Inn and run it as a community-owned pub. Herefordshire CAMRA has been involved with the PC in an advisory capacity on this matter over a number of years. Their intentions are absolutely serious, as can be confirmed by the detailed business plan they have published.
- 1.8 The advantage that community ownership offers is that the business model strips out a lot of the costs from the business. The mortgage to purchase the premises would sit with the PC in the shape of a (Government) *Public Works Loan Board* loan, and a licensee is then granted a lease at significantly lower rent than the previous pub company leaseholders. The leaseholders would also be able to buy all their wholesale products (beer, wine, spirits and food) on the open market at lower prices. On the revenue side, community ownership also engages the local community better: people are enthused to visit *their* pub. They have an emotional and financial buy-in. This model of ownership has been used at the Crown Inn at Dilwyn, Herefordshire H4 8HL to good effect since 2012. It is just one of over 130+ community-owned pubs that are currently successfully operating in the UK.
- 1.9 In the summary of Section 7 of the appellant's report, claims are made that the Lamb Inn is, quote: "tucked away", and that there is a lot of local competition; there is no real opportunity for a further destination pub, and no core of locals who support the pub. CAMRA wishes to argue otherwise on all four of these assertions:
 - 1.9.1 The Lamb Inn is a direct drive of 2.1 miles from the busy A49 trunk road; 2.3 miles from the A44 trunk road; 2.9 miles from the centre of Leominster (population 11,691 [2016 figures]) and only c.12 miles from the city of Hereford (population 63,000 [2016 figures]). It can hardly be considered in any way as remote. In terms of geography, it enjoys the twin benefits of being both rural in character and disposition, but easily accessible to a significant urban population.
 - 1.9.2 Numerous pubs are listed in Section 7 of the appellant's report in an effort to suggest that the Lamb Inn has a lot of competition. But this analysis falls short, both in terms of its

accuracy and conclusions. Of the **EIGHTEEN** pubs quoted as being within a four mile radius of the Lamb Inn, the following observations are made:

- **TWELVE** of them are town pubs in Leominster, **FOUR** of which are permanently closed and converted to other uses (the Black Horse and The Three Horseshoes closed approaching ten years ago). These are very different in character to the Lamb Inn. They are town pubs, not dining pubs with the attractions of a village inn. Many of them do not do hot meals.
- **THREE** are cafe-bars in Leominster town, **TWO** of which are permanently closed.

This just leaves **THREE** of the **EIGHTEEN** listed pubs to be accounted for:

- The Fisherman's Arms at Docklow is not a pub, it is a on-site social club that offers facilities to residents and visitors to what is an angling resort. It is not open all the year round and closes at 9-9.30pm.
- The Kings Arms at Docklow is closed, future uncertain.
- The Stockton Cross is to the north east of Leominster. It is the only pub from the list of eighteen that is a country/village pub that is open and accommodates diners. The fact that currently diners are required to book for meals suggests strong demand.

The fact that some of the data in the appellant's report that is so inaccurate is disappointing, and gives cause for concern as to the veracity of data used elsewhere that has not been subjected to any scrutiny.

- 1.9.3 There is a further list of ten pubs that are described in the report as being in competition with the Lamb Inn. Six of them are the other side of Leominster to Stoke Prior (either north or west); two are closed or have restricted access (Kings Head and Fishermans' Arms at Docklow – see earlier), which just leaves the England's Gate Inn at Bodenham and the Barneby Arms at Bredenbury. Neither are within four miles distant.
- 1.9.4 So, is there an over-provision of pubs that are competing with the Lamb Inn? One way to make a more objective assessment is to look at the area bounded by the triangle of roads made up by the A44, A49 and A465. This is an area of over 60 miles square, and within this area are only EIGHT pubs. (these pubs are listed in Appendix A). Two of them do not do meals. This evidence flies in the face of the statement made in the appellant's report that, quote: "There are a great many destination pubs in and around this part of Herefordshire."
- 1.9.5 Rather than suggesting that there is no scope to develop the 'destination' business at the Lamb Inn, attributes such as good road accessibility, proximity of urban populations, and a limited amount of competition in the local area strongly suggests otherwise.
- 1.9.6 One strong suit the Lamb Inn has is that it can rely on its local community. They have supported it in the past, and will do so again if provided the opportunity. The reasons that the village don't support the current owner is set out in the many letters of objection to the original planning application. It probably isn't helpful to discuss those comments in this submission, but it is quite clear that the appellant has 'lost' the village. This is not only a disappointment, but will have been a serious blow to the owner's business.

- 1.9.7 The local trade at the Lamb Inn can be revived – particularly if the Parish Council take the pub into community ownership. An example from another local pub in Herefordshire, the Wheelwright Arms at Pemcombe HR7 4RN, is enlightening. This pub is one of those featured as a photo (with description) in Section 7 of the appellant's report. It is telling to read that it is, quote: "Well supported by the local community." Pemcombe has a broadly similar population to Stoke Prior, which prompts the question: why can't the Lamb Inn do the same?

For the reasons stated, CAMRA asserts that commercial non-viability of the Lamb Inn is not proven.

2. FAILURE TO MARKET THE PROPERTY AS A PUB BUSINESS

- 2.1 It is acknowledged in the appellant's own report accompanying this appeal that no efforts have been made to market the premises. Furthermore, the owner has gone on record to state that he has no intention of putting the pub onto the licensed property market.
- 2.2 Considerable argument has been made on behalf of the appellant that the appropriate Herefordshire Council planning policies that appertain to the marketing of community facilities do not require the owner to undertake a marketing exercise before seeking conversion to an alternative use, if the pub has been left vacant. It is the view of CAMRA that this is essentially a semantic and specious argument, and that other (national) planning policies (including the NPPF) and the Parish Neighbourhood plan still strongly support the retention of the pub as a community facility.
- 2.3 Further, there is a claim made in the report that there is no demand for the pub as a community facility. However, the report fails to provide any evidence as to how this decision has been arrived at. Therefore, it is not possible to comment further on this aspect of the application.

3. INTEREST AS A PUB BUSINESS

- 3.1 What is not in doubt is that there remains a serious intent on the part of the Parish Council to purchase and run the Lamb Inn on behalf of the local community. It is their view that it can be run as a viable and successful business under community ownership. On the 14th March 2018 the council voted to proceed to purchase the pub if it were to come onto the market. Therefore, it is only the owner frustrating their ambition that has stopped this happening. Therefore, there can be strong confidence that bringing the pub to market will result in it reopening to the benefit of all.
- 3.2 However, it is unlikely that the parish Council will be the only interested party should the pub be placed on the licensed property market. The Lamb Inn as a village pub, free from tie and in a good location (in terms of population and accessibility), with modern facilities will create interest. A number of Herefordshire pubs that have previously been closed for prolonged periods have re-opened in the past 12-18 months, including the Monkland Arms at Monkland HR6 9DE.

- 3.3 Consideration needs to be given to the likely financial sustainability of the Lamb Inn. Notwithstanding the interest from the Parish Council (with the guarantees and protections that potentially provides), one only needs to look at similar pubs (such as the Wheelwrights Arms at Pencombe) that are thriving in less advantageous locations.
- 3.4 There are many pubs in Herefordshire that are far more remote than the Lamb Inn, and with fewer facilities, that trade very successfully. These include the Bridge Inn at Michaelchurch Escley HR2 0JW; Fountain Inn at Orcop HR2 8EP; Carpenters Arms at Walterstone HR2 0DX; Baiting House at Upper Sapey WR6 6XT, and the Yew Tree Inn at Preston-on-Wye HR2 9JT. (this list is by no means exhaustive)
- 3.5 None of these pubs listed are in villages, nor are they anywhere near an 'A' road, and none lie within a 20 minute drive out from a town or city. The Lamb Inn has none of these drawbacks, suggesting that the pub has a number of strong trading advantages that would appeal to a potential new operator.

4. IMPACT OF LONG TERM CLOSURE

- 4.1 If the Lamb Inn were to be permanently lost this would have a long-lasting negative impact; not only with regards to the local community, but to the wider community too.
- 4.2 The Lamb Inn has been a key part of the social and cultural fabric of Stoke Prior since at least the early 19th Century. It is a meeting place for those who live in the village and the wider rural community too - including the likes of nearby Risbury, which has no pub.
- 4.3 The Lamb Inn has been the venue for ad hoc and organised social gatherings for generations. It hosted many community functions; wakes, wedding receptions and the like in the past. It was, until recently, the base for pub sports and games teams and quizzes – many organised by those in the village. The loss of these events and activities undermines community cohesion.
- 4.4 There is no realistic alternative to the Lamb Inn for the local community to use. The village has no public transport, and walking would be along unlit country roads. The nearest pub is therefore a drive away, which disadvantages those who cannot drive or do not have access to a vehicle and may encourage drink-driving.
- 4.5 The Parish Council has plans to relocate the life-expired village hall to a facility at or adjacent the pub. If the pub ultimately closes, this opportunity will be lost. There are other opportunities to diversify activities at stake too.
- There will be a permanent loss of full and part-time employment opportunities in a rural area. This will especially affect the young and those whose circumstances dictate that they can only work part-time, and who may not have access to transport to find suitable alternative employment opportunities.
 - Local wholesale suppliers are also losing business whilst the pub isn't trading.
 - There will be a negative impact on the county's overall tourism offer, especially with the Lamb Inn being close to the A44 and A49 trunk roads. Its demise would represent the loss of another 'destination' for residents and tourists alike to drive out to visit.

DOCUMENTS ENDS

Herefordshire CAMRA

17 October 2018

APPENDIX A:

Pubs enclosed by the triangle of the A44, A49, A465

Includes roadside pubs on the roads named, but excludes town and city pubs in Hereford, Leominster and Bromyard.

Amberley Arms, Marden HR1 3BX

Barneby Arms, Bredenbury HR7 4TF

Cross Keys, Withington HR1 3NN

Englands Gate Inn, Bodenham HR1 3HU

Golden Cross, Sutton St.Nicholas HR1 3AZ

Plough Inn, Stoke Lacy HR7 4HG

Railway Inn, Dinmore HR1 3JP

Wheelwrights Arms, Pencombe HR7 4RN