



Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milton Hill
Leamington Spa
CV32 5QH

27 June 2014

Our ref: MGM002/WR/BB

Dear Sir/Madam,

WARWICK DISTRICT PUBLICATION DRAFT LOCAL PLAN APRIL 2014

We welcome the opportunity to comment on the draft Local Plan prior to submission to the Secretary of State for independent examination.

The importance of tourism to the District's local economy is acknowledged and we agree that the Plan should positively promote and actively deliver tourism. We generally support policies CT1 '*Directing New Tourism, Leisure and Cultural Development*' and CT2 '*Directing New or Extended Visitor Accommodation*' in so far as they relate to general strategy. Our concerns relate to policy CT3 and its effect on development.

Whilst it is acknowledged that visitor accommodation in the Town Centre helps to support a vibrant economy, it is important to ensure that policy CT3 '*Protecting Existing Visitor Accommodation in Town Centre*' is not unduly restrictive for the following reasons:

- many existing hotels are located within historic buildings;
- a proportion of listed buildings are no longer meeting modern customers' expectations and it is not financially viable to upgrade them to meet these expectations. The closure of these facilities would impact the street scene and vitality of the town centre;
- due to scale of the existing visitor accommodation in the town centre the conversion of these units is not appropriate and would not meet the demands of local retailers (Use Class A1);

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- in many instances it is not appropriate to convert the upper floors into retail or assembly and leisure uses with residential a far more appropriate use; and
- it is considered inappropriate to subdivide the ground floor to create numerous shop frontages due to number of conservation areas and listed buildings. The sub division would have an adverse impact on the street scene.

Accordingly Policy CT3 is unclear and only addresses the redevelopment of visitor accommodation in town centres, with no subsequent policies addressing visitor accommodation outside of these areas. The policy also fails to acknowledge that in some circumstances visitor accommodation occupies the upper floors with a different use occupying the ground floor (most commonly restaurants, cafes' and public houses (Use Class A3 and A4) but not inclusive). There is no reason for not identifying these situations in the policy's supporting text.

'*Warwick District Council Tourism Strategy*' forms part of the Local Plan evidence base, whilst it is unclear when this document was produced as it is not dated, it states that, "*most are day visitors living within Coventry/Warwickshire/West Midlands.*" Additionally, the document does not provide any evidence on need for visitor accommodation. Furthermore, we note that in the existing Local Plan there is no policy protecting existing visitor accommodation. There is no evidence to suggest that there has been an unprecedented amount of visitor accommodation closures, given the economic circumstances over the plan period. Thus, we question how justified policy CT3 is in terms of protecting all visitor accommodation in the town centre and whether there is a need for such a policy based on the evidence at hand.

For the above reasons policy CT3 is considered **unsound** due to it being **unjustified** and **ineffective**. This policy is not felt necessary as it is not formed upon empirically based evidence and it felt the policy should be deleted. In its current form, the policy does not serve its purpose and has unintended consequences, such as:

- vacant buildings in the historic core;
- 'run down' historic buildings;
- lack of clarity over visitor accommodation out-side the town centre; and
- lack of clarity over buildings which have alternative uses on the ground floor; and
- reduction of inward investment in the town centre.

However, subject to the Council producing an evidence base prior to adoption, it is suggested that policy CT3 is renamed to '*Protecting Existing Visitor Accommodation in ~~Town Centre~~*' and reworded as follows:



“Redevelopment or change of use from visitor accommodation within the town centres (as identified in the Policies Map) will only be permitted where it can be demonstrated that the proposal meets one of the following criteria:

Groundfloor/street frontage

- a. *the site is within a retail area as identified on the Policy Map the preferred ~~and the proposal is for~~ a change of use to retail or is a change of use to assembly and leisure within a secondary retail area (see policy TC3);*
- b. *where (a) is not practical this is to be demonstrated and accompanied by a viability assessment identifying that the existing accommodation is no longer viable.*

Upperfloors

Permission will be only be granted when it is demonstrated that the proposals meet one of the following:

- c. *there is evidence of adequate capacity to meet need within alternative accommodation within the same Town Centre; or*
- d. *the visitor accommodation is no longer viable and no other parties are willing to acquire it for that use.*

Out of centre

Where the development falls outside a defined town centre, as identified in the Policies Proposal Map, any proposals for redevelopment or change of use will accord with (c) above.”

It is also felt that in either the policy TC3 or its narrative, the Council should define what adequate capacity is considered to be, otherwise this term remains a barrier to a well-defined policy. Any definition would need to be robust, it is suggested that discussions are undertaken with owners of visitor accommodation within the district and their agents to establish what a suitable vacancy rate is.



The re-wording of policy CT3 would enable conversion of visitor accommodation when the applicants prove that the premises is no longer viable or there is evidence of existing capacity within the same town centre. The conversion of these dwellings would prevent long term vacant units that impact the street scene whilst ensuring a footfall into the town centre. We feel it is necessary to amend the sections the requirement to provide evidence of alternative accommodation and capacity in the town centre because at the moment it is undefined and unquantifiable, in turn making it unjustified. The revised policy also takes into consideration visitor accommodation outside of defined town centres.

Summary

There is a lack of empirical evidence to justify the requirement for Policy CT3, therefore the policy as it stands is currently **not sound or justified** and should be deleted. However, should a suitably robust evidence base be produced prior to the adoption of the Local Plan the policy should be reworded as suggested to ensure it is sound and effective.

We trust that the comments we have made on this version of the Plan are helpful and will also be forwarded to the Inspectorate. Should you require any additional information or clarification on the points made, please do not hesitate to contact me.

Yours faithfully

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Associate

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