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RESPONDANTS - 3196  
AGENTS - 5464

**Our Ref:** JNP2239

**E-mail:** [nick.laister@rpsgroup.com](mailto:nick.laister@rpsgroup.com)  
**Date:** 20 July 2012

Gary Stephens  
Head of Policy, Projects and Conservation  
Warwick District Council  
Riverside House  
Milverton Hill  
Leamington Spa  
Warwickshire  
CV32 5HZ



Dear Mr Stephens

**Warwick Local Plan – Preferred Options**

I enclose on behalf of the Hatton Estate representations to the Preferred Options. Please note that parts of these representations have, where relevant, been uploaded on line.

The representations set out changes to the proposed policies for Tourism and Culture, the Green Belt and Housing. More specifically they call for site specific policy framework's to be included for existing tourist and culture attractions including the Hatton Estate, the identification of previously developed sites within the Green Belt, and the allocation of small scale village extensions for housing within the Hatton Estate.

We should be grateful if you could acknowledge receipt of these representations in writing and inform us of the next stages of the process.

We look forward to hearing from you.

Your sincerely  
For RPS



*P.P.*

**Nick Laister**  
Senior Director

cc: J Arkwright, Hatton Estate



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FS 32940



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## Preferred Options Response Form

2012

For Official Use Only

Ref:

Rep. Ref.

Please use this form if you wish to support or object to the Preferred Options version of the new Local Plan.

**If you are commenting on multiple sections of the document you will need to complete a separate copy of Part B of this form for each representation.**

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices or places where the plan has been made available for members of the public. You can also respond online using the IDF Consultation System, visit: [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)

WDC PLANNING
Ref
Officer
29 JUL 2012
EE GR PD MA
PRE GEN DIS

### Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title		MR
First Name		NICK
Last Name		LAISTER
Job Title (where relevant)		SENIOR DIRECTOR
Organisation (where relevant)		RPS PLANNING
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Address Line 3		OXFORDSHIRE
Address Line 4		
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Telephone number		01235 821 888
Email address		NICK.LAISTER@RPSGROUP.COM
Would you like to be made aware of future consultations on the new Local Plan?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
About You: Gender		
Ethnic Origin		
Age	<input type="checkbox"/> Under 16 <input type="checkbox"/> 16 - 24 <input type="checkbox"/> 25 - 34 <input type="checkbox"/> 35 - 44	
	<input type="checkbox"/> 45 - 54 <input type="checkbox"/> 55 - 64 <input type="checkbox"/> 65+	

## Part B - Commenting on the Preferred Options

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet  of

Which document are you responding to?  
e.g. Preferred Options (Booklet) Preferred Options (Full Version)

PREFERRED OPTIONS (FULL)

Which part of the document are you responding to?  
Preferred Option Box (e.g. PO1)

HOUSING

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites - Whole District)

What is the nature of your representation?

Support  Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

SEE ATTACHED WRITTEN REPRESENTATIONS.

For Official Use Only

Ref.

Rep. Ref.

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e.g. Preferred Options (Booklet) Preferred Options (Full Version)

PREFERRED OPTIONS (FULL)

Which part of the document are you responding to?  
Preferred Option Box (e.g. PO1)

GREEN BELT

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites - Whole District)

What is the nature of your representation?

Support  Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

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PREFERRED OPTIONS (FULL)

Which part of the document are you responding to?  
Preferred Option Box (e.g. PO1)

TOURISM & CULTURE

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites - Whole District)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

SEE ATTACHED WRITTEN REPRESENTATIONS.

For Official Use Only

Ref:

Rep. Ref.



## **Warwick District Local Plan: Preferred Options**

**Representations on behalf of the Hatton Country World**

**By RPS Planning**

**July 2012**

### **Introduction**

1. RPS is instructed by the Hatton Estate to make these representations on the Warwick Local Plan Preferred Options Consultation Document May 2012. We made representations on the Core Strategy Preferred Options in September 2009, and the Local Plan Issues & Scenarios Consultation Document in July 2012.
  
2. RPS understands that it is the Council's current intention that the Local Plan should, in addition to the strategic objectives and the allocation of strategic sites which would have been covered by Core Strategy, cover site allocations and development management policies which would originally have been covered by a separate Development Plan Document (DPD). However, whilst we welcome this approach we note that the Preferred Options document does not actually identify any specific site allocations.

### **Background**

3. In its engagement with the Local Plan process, Hatton Estate has two principal objectives:
  - to secure an appropriate planning policy framework which will allow the major visitor attractions operating on the Hatton Estate (currently called 'The Hatton Experience'), which collectively are one of the District's principal visitor destinations, to prosper and diversify and thus enable it to continue to contribute to the District's economy
  - to seek the allocation for housing of sites which are both on the edge of the Hatton Estate and on the edge of settlements to the west of Warwick.

demonstrated in 2000/01 during the foot and mouth crisis, when the cloven footed animals had to be removed from the park.

8. Warwick DC recognises that the site plays an important part in the local economy, and that it is an important resource for local schools and an important educational/recreation facility in the District (see officer's report to WDC Planning Committee on 16 September 2009).
9. The Estate also includes the Hatton Arms pub and restaurant, which stands at the top of Hatton Hill on the A4177 between Warwick and Solihull, and which was originally an 18th Century coaching inn. The building and gardens overlook the famous 'Stairway to Heaven' flight of locks on the Grand Union Canal, which are a key tourist attraction.
10. Permissive footpaths known as Hatton Country Walks have also opened up large areas of the Estate, and link various elements of the Estate together (The Hatton Experience, Hatton Locks, Hatton Station) and encourage access to the countryside. The aim is to encourage a wider demographic of visitors to the area, which will benefit the local economy.

#### *Current Planning Status*

11. Following extensive discussions some 10 years ago, a Supplementary Planning Guidance document, three planning applications and a Section 106 Agreement were approved in 2001, setting a framework for the development of the site. In addition, the Warwick District Local Plan 1996 – 2011 contains a site specific policy (SSP8).

#### *Current Issues*

12. Since the planning permissions referred to above were granted, visitors to the shopping village declined to a level that had a serious adverse effect on the viability of the individual craft and shop units. At the time the planning consents were granted in 2001, total visitors amounted to approximately 700,000. They remained at this level in 2002/3, but had fallen to around 490,000 by 2007/8, as illustrated in the graph below. This shows that the overall decline was entirely attributable to the decline in the number of visitors to the shopping village, which fell by some 44% over the six years to September 2008. Sales levels reflected this fall. Farm village numbers

15. Craft/antiques used to be the core (or anchor) attraction – centres such as Hatton need a clear speciality or 'point of difference' to be successful and for the future. That point of difference needed to be shifted to the countryside/outdoor theme with a special emphasis on the parents and children who visit the Farm Park.
16. Following the start of the recession in autumn 2008, footfall and the drop in sales were far more pronounced than those reported on the High Street. A significant number of the tenants' businesses were in jeopardy, and the Hatton Estate supported them with rental reductions and the reintroduction of a programme of on-site events to drive footfall.
17. In order for units to return to profitability, current customer flow needed to be concentrated more tightly and the decline in visitor numbers reversed by improving catering, introducing weather protection and rebalancing the mix of uses to match current customer tastes and our countryside/outdoor theme.

#### *The Response*

18. Following a review of the business and the market in which it operates, four objectives were set:
  1. To increase the average visitor spend by 25% to offset falling visitor numbers;
  2. To strengthen the educational facilities;
  3. To even out visitor numbers during the year; and
  4. To clarify and strengthen the Hatton brand.
19. In response to these issues a planning application for site improvements at the Hatton Experience was submitted in February 2009. The proposals contained in the planning applications were to extend the farm park undercover area, to realign the shopping village in such a way that the profitability of individual units is enhanced in both clement and inclement weather, and to vary the mix of craft/countryside retail uses with the objective of reversing the slide in visitor



the introduction of accommodation. It has the effect of making the business (and the local tourism economy) more resilient. Such accommodation also carries with it sustainability benefits, with visitors to the attraction staying on-site for short breaks and therefore potentially reducing the need to travel. This would also encourage visitors to visit other attractions/restaurants in the area and thus support the local economy without significant increases in volumes of traffic.

24. The Hatton Estate is considered to be very important to the District as a visitor destination. In order to ensure that it remains sustainable in the long term, to meet the owner's objectives for the business, to maximise jobs and benefits to the local economy and to better meet the Council's current aspirations for tourism in the District, we consider that the following are required:

- A site-specific policy for the Hatton Estate as a strategic tourism site. This will define the core area of the site for leisure use and will set out a criterion-based policy for future development, which would allow for:
  - a) Continued improvement of the farm park as a major rural leisure destination, with support for development that will improve and enhance the role of the site as a tourism destination
  - b) Consolidation of the retailing outside the farm park, with a focus on rural/countryside-related products. This would not necessarily entail an increase in retail floorspace.
  - c) Tourism accommodation of a scale appropriate to the visitor attraction as a whole.
  - d) Renewable energy, primarily for the site's own use.
- Consideration of identifying the site as a 'Previously Developed Site in the Green Belt' to provide a framework for its ongoing improvement and redevelopment. The suggested extent of this Previously Developed Site is shown on the attached Figure 1 and is based on the extent of existing structures within the operational area and their curtilage.

should actively deliver. This is a distinct improvement on the Issues & Scenarios document which we welcome.

28. However, the scope of policy PO17 is far too narrow. Its support for “new visitor attractions and cultural assets” is too narrow in that it does not provide support to existing tourist attractions. This is inconsistent with the Government’s policy as set out within the NPPF. Paragraph 28 of the NPPF sets out that planning policies should support economic growth in rural areas by taking a positive approach to sustainable new development, and in particular sets out that local plans should support sustainable rural tourism developments that benefits business in rural areas, communities and visitors, and which respect the character of the countryside. It continues ‘*This should include supporting the provision and expansion [RPS emphasis] of tourist and visitor attractions in appropriate locations where identified needs are not met by existing facilities in rural service centres.*’
29. We therefore suggest that the first sentence in Policy PO17 is reworded as follows: ***“The sustainable development of new visitor attractions and cultural assets and the further development and improvement of existing attractions will be supported where it can be demonstrated that there is a need and the location is appropriate.”***
30. The Hatton Estate provides significant employment and prosperity to the local area, for the reasons set out in the previous section. As an existing business it should be afforded the opportunity to evolve to meet the challenges the business will inevitably have to face over the plan period, and expand in order to sustain its business and the jobs and its important contribution to the local economy. As such, in order to ensure the Local Plan will provide an appropriate framework for the owners of tourist attractions to implement their objectives we suggest that reference should be made within the policy to key existing tourist attractions such as the Hatton Estate together with policy provisions for each. For the Hatton Estate, the objectives are well defined as set out above at paragraph 24. We therefore suggest the following specific policy provisions should be incorporated:

**“Hatton Estate:**

way as current Local Plan policy SSP2 identified Major Developed Sites in the Green Belt. This provision should be incorporated into policy PO16 in the same way that it identifies villages removed from the Green Belt. The boundary shown in Figure 1 should be used to identify the site in the Local Plan.

35. The benefit of this approach would be to provide the necessary certainty to landowners, the Council and the general public that certain types of development would be acceptable in Green Belt terms (subject to other policies of the Plan).
36. In addition, care should be taken to ensure that the remainder of policy PO16 is consistent with the other provisions of the NPPF. The wording of the last bullet of policy PO16 (C) is considered to be particularly poorly worded at present, as it is not clear whether Part C applies to all previously-developed land, or only previously-developed land in Category 3 villages. If the latter, this is much more restrictive than the NPPF. We suggest that the final bullet point of Policy PO16 is reworded as follows:

“...

- **Limited infilling on**
  - (i) previously-developed land,**
  - (ii) in Category 3 villages, and**
  - (iii) on identified existing previously developed sites in the Green Belt.”**

#### **Housing**

37. As acknowledged in the Preferred Options document, the NPPF requires planning authorities to use their evidence base to ensure the Local Plan meets the full objectively assessed needs for market and affordable housing. In this regard, using the West Midlands Integrated Policy Model, the Preferred Options identifies that in order to meet the projected growth in employment 700 new homes would be required for each year of the plan period.
38. However, this is rejected as the Preferred Option essentially on the basis of the level of housing that would be required on greenfield and Green Belt/countryside sites that would be required. There is no basis for such an

phased across the plan period without resulting in significant adverse impacts on any of the dimensions of sustainable development, and are identified in the Council's SHLAA. It is, therefore, suggested that, in addition to brownfield land within extended village envelopes and greenfield infill sites, small scale village extensions should also be allocated where appropriate, to meet the District's housing requirements rather than relying on windfall projections. Policy PO4 should be amended to reflect this and allow for a proportion of the District's housing growth to be on allocated greenfield sites adjacent to the villages.

### **Conclusion**

43. In conclusion, we reiterate our general support for the recognition of the importance of tourism, and in particular rural tourism. Our principal concern is that the proposed policies relating to tourism are much too narrow and should be expanded to provide an appropriate framework for existing tourist attractions to meet their future needs, not just the development of new attractions, and to better recognise the importance of the Hatton Estate through a site-specific policy. This should be alongside formal recognition that a large part of what is currently branded as 'The Hatton Experience' is a major previously-developed site in the Green Belt and should be identified as such in the Local Plan.
  
44. With respect to housing, we are concerned that the housing requirement is being curtailed by subjective concerns for the environment that have not been objectively assessed, and by deriving housing needs without regard for influence of settlements outside the District which have an impact on the housing area. There is also concern that potential sustainable small scale extension to rural villages have been unnecessarily overlooked.