

LOCALPLAN

helpingshapethedistrict



Publication Draft Representation Form 2014

For Official Use Only

Person ID:

Rep ID:

This consultation stage is a formal process and represents the last opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) before it is submitted to the Secretary of State. All comments made at this stage of the process are required to follow certain guidelines as set out in the **Representation Form Guidance Notes** available separately. In particular the notes explain what is meant by legal compliance and the 'tests of soundness'.

This form has two parts:

- **Part A – Personal Details**
- **Part B – Your Representations**

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

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 (see the table below). You can also respond online using the Council's e-Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be received by **4.45pm on Friday 27 June 2014**

To return this form, please deliver by hand or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH**
or email: newlocalplan@warwickdc.gov.uk

Where to see copies of the Plan

Copies of the Plan are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and at the following locations:

Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa

Leamington Town Hall, Parade, Royal Leamington Spa

Warwickshire Direct Whitnash, Whitnash Library, Franklin Road, Whitnash

Leamington Spa Library, The Pump Rooms, Parade, Royal Leamington Spa

Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick

Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth

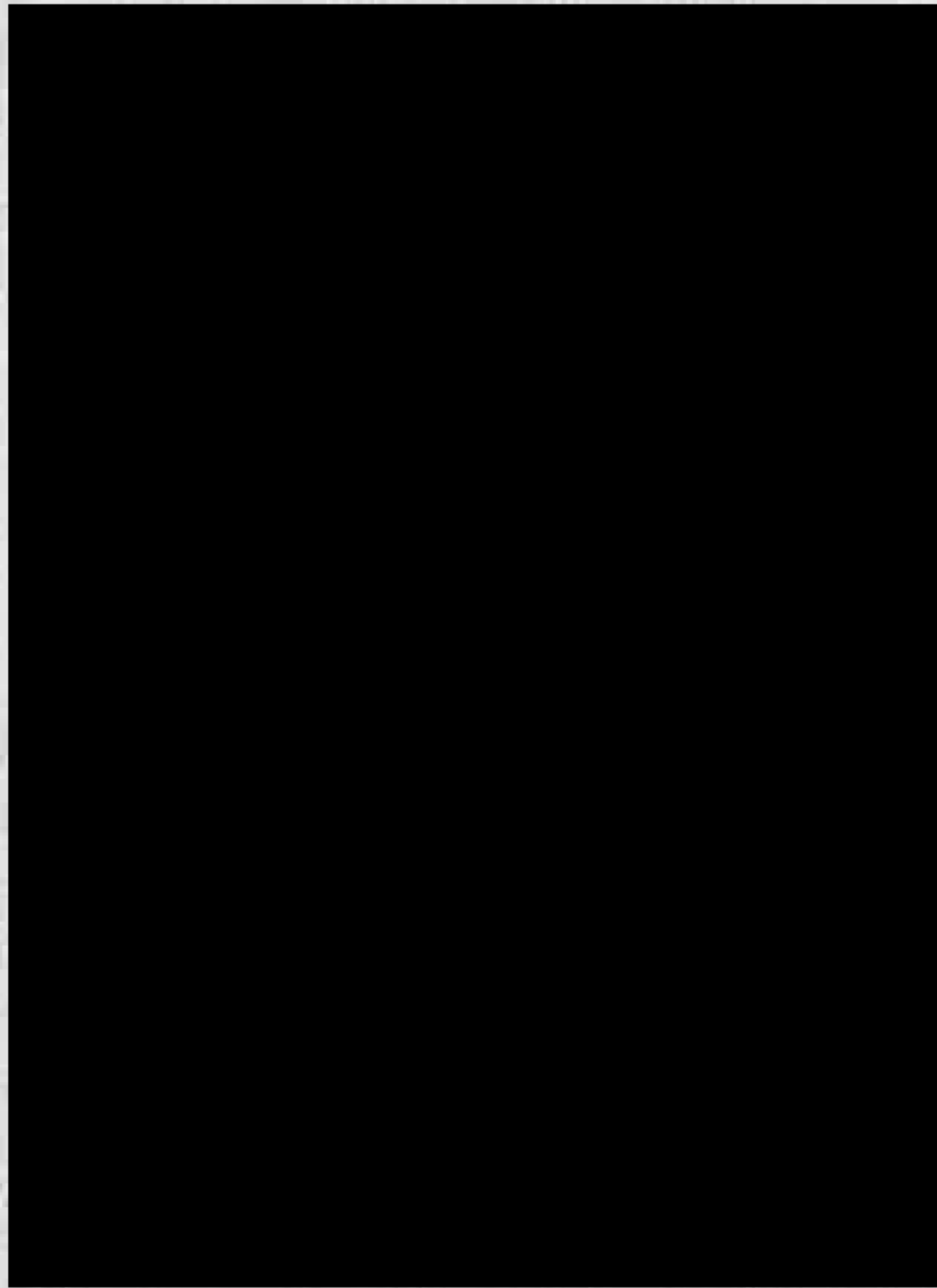

Warwickshire Direct Lillington, Lillington Library, Valley Road, Royal Leamington Spa

Brunswick Healthy Living Centre, 98-100 Shrubland Street, Royal Leamington Spa

Finham Community Library, Finham Green Rd, Finham, Coventry

Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.

Part A - Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)
	* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.	
Title	Mr	Mr
First Name	Geoff	Nicholas
Last Name	Spooner	Thompson
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone number		
Email address		

3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Local Plan for independent examination	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
The adoption of the Local Plan.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA: Warwick District Council Publication Draft New Local Plan

Paragraph Number: -

Policy Number: CT7 Warwick Castle and Warwick Racecourse/St. Mary's Lands

Policies Map Number: -

5. Do you consider the Local Plan is :

5.1 Legally Compliant? Yes No

5.2 Complies with the Duty to Co-operate? Yes No

5.3 Sound? Yes No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

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7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Warwick Castle welcomes and supports the inclusion of a specific policy with regards to development at Warwick Castle, given its importance as a visitor attraction within Warwick and the region. Warwick Castle generates a wide range of economic benefits. However, it operates within the leisure/tourism sector where there is significant competition and ongoing investment by many other 'attractions'. Furthermore, it undertakes significant work to the heritage assets (both buildings and landscape) including the Grade I listed Castle (in part a Scheduled Ancient Monument).

Given that Warwick Castle is privately owned, all investment and maintenance costs are met by income. Therefore, it is vital that Warwick Castle continues to improve its facilities and maintains its attractiveness to visitors and requires a positive policy environment to clearly support its endeavors. Section 12 of the NPPF states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment including heritage assets, and amongst other matters, should take account of the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. Para. 137 goes on to state that LPA should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting, that make a positive contribution to or better the significance of the asset should be treated favourably. CONTINUED ON SEPARATE SHEET.

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see separate sheet.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Grade I listed Warwick Castle is a privately owned and operated property. The wide ranging benefits of the Castle, as a major heritage attraction, include the ongoing repair and maintenance of the property, which is entirely funded from income received from visitors. As an example, the repair to the North and East walls which will commence in 2015 at a cost of £1million over a minimum of two years. In order to ensure that the Castle continues to be a successful attraction there is a requirement to maintain its visitor numbers. This, in part, requires the 'offer' to visitors to be maintained and updated. The Castle therefore needs to review the range and quality of its facilities in order to ensure regular and repeat visits from new and existing visitors. It is critical that the planning system supports development at the Castle, the draft wording of the policy - whilst very positive in the medium/longer term - could become a potential barrier for short term investment at the Castle. Therefore, Warwick Castle and its representatives would like to attend the examination to present their views and discuss the minor but important alterations to the policy.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed: 

Date :

27 JUNE 2014

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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Part B.7.

Continued...

Whilst Warwick Castle is willing to prepare a masterplan, this may take several months and in the interim development projects may need to be progressed. Accordingly, the policy has been amended to enable applications to be submitted/determined in the absence of an agreed masterplan.

Whilst Warwick Castle does not object to the policy also referring to Warwick Racecourse, the draft policy makes very limited reference to it. Accordingly some minor alterations make the policy applicable to both. As an alternative, Policy CT7 could be split, including sub-paragraphs on the Castle and Racecourse to explain what a masterplan should cover for each site. This would perhaps make the policy clearer and be consistent with the subsequent explanatory paragraphs.

Part B. 8.

CT7 Warwick Castle and Warwick Racecourse/St Mary's Lands

Development at Warwick Castle or Warwick Racecourse (within the boundaries defined on the Policy Map) ~~will only be permitted where it is brought forward in line with an approved Masterplan~~ **is supported. The Council will work with Warwick Castle and Warwick Racecourse to prepare a masterplan for each site to guide future development**, setting out the development principles and broad areas for development, indicating the type of uses proposed ~~and, in the case of the Castle, a Conservation Plan for the historic asset~~. The Masterplan **for each site** will provide the framework within which planning applications will be determined and will:

- a) identify the physical and economic context ~~of the Castle~~;
- b) identify the development principles to underpin future development proposals;
- c) identify the significance of heritage assets within the vicinity, setting out how these will be sustained and enhanced (including listed buildings, listed parks and gardens, conservation areas and historic landscapes);
- d) identify the location of developments, demonstrating how proposals will relate to the heritage assets and how they will enhance the positive contribution the asset makes to sustainable communities and to the character and distinctiveness of the area; and
- e) identify how the proposals support the vitality and viability of the local economy

Explanation

Warwick Castle

3.136 Warwick Castle is a nationally/internationally renowned tourist attraction bringing significant benefits to the local economy. It is a Grade 1* listed building set within Grade 1 landscaped grounds. The site includes several other Listed Buildings.

3.137 Balancing the development pressures with the sensitivity of the location is an on-going challenge. Further there are opportunities to enhance the links between the Castle and Warwick Town Centre, bringing economic benefits to the Town Centre. ~~The challenge is to ensure development within the Castle grounds does not undermine the range of facilities and services available in the adjacent Town Centre.~~

3.138 In this context this policy ~~seeks to support~~ **s** the role of Warwick Castle as a nationally/internationally renowned attraction at the same time as ensuring the significance of the local heritage assets (including the Castle itself) are sustained and enhanced. It is also important that

the mix of activities on offer within the Castle grounds allows both the Castle and the Town Centre to play to their strengths to the mutual benefit of both.

3.139 It is therefore proposed that individual projects requiring planning permission should be brought forward within the context of a Masterplan for Warwick Castle. **The masterplan should be kept under review. Should other development proposals for the Castle site be promoted, these will be considered in light of points (a) to (e) in Policy CT7.** This will be a positive strategy for the conservation and enjoyment of the historic environment.