



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.

4. The Hatton Estate is situated in a rural setting forming and covers 240 hectares. The full extent of the Hatton Estate is shown on Figure 1. The Estate incorporates the Hatton Farm Village, Hatton Shopping Village, Hatton Arms and a number of countryside walks, the link into Hatton Locks, and small-scale rural business units. Figure 1 identifies the land within the Estate that forms the Hatton Farm Village and Hatton Shopping Village attraction. It also identifies an area which we consider should be defined as a Previously Developed Site in the Green Belt (in accordance with policies set out in the National Planning Policy Framework (NPPF), and four potential sites for housing.
5. The Hatton Estate's core business is its provision of rural leisure and retail attractions on a countryside theme and, since its founding as a craft centre in 1982, it has evolved in response to consumer demands and tastes within the constraints imposed upon it by the nature of its physical assets and by planning policies.
6. The Hatton Experience is a very popular countryside visitor destination, comprising a farm park and shopping village employing about 200 people. As the second most visited attraction in Warwickshire (after Warwick Castle) in terms of both total and paying (the Farm Village) visitors, it complements the heritage attractions in the area. It is also one of the most highly regarded farm diversification projects in the UK. Four government ministers have visited the site in the past 12 years, most recently the Tourism Minister in June 2007.
7. The Farm Park is focussed on families (with children up to the age of 10) and consistently attracts over 200,000 visitors a year. Of these, some 20,000 visits are made by schools. The Farm Park also has a membership of approximately 3,000 local families who visit the Farm Park on average around 10 times a year. Members, day visitors and schools are attracted by the ability to see and touch farm animals. Considerable weight is given to both the educational value of the visit through displays and demonstrations (falconry, sheep dogs, small farm animals, food and farming, etc) and the close interaction between parent and child in numerous on site activities. This “edutainment” is balanced by the need to provide exercise/excitement for children with a variety of play equipment whose importance to the viability of the business was

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.

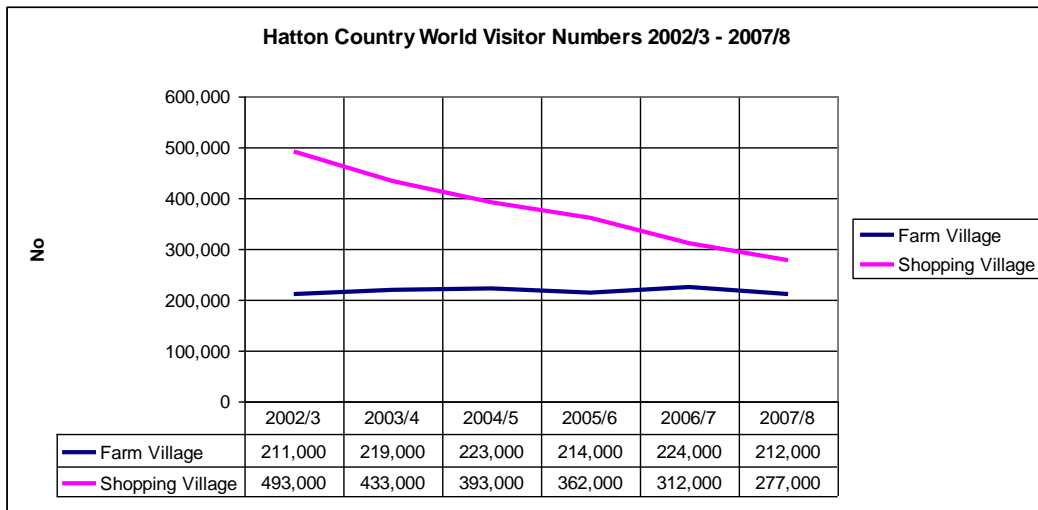
Current Planning Status

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

remained fairly constant over this period. Visitors to the Shopping Village have fallen further since 2008.



13. In these circumstances, the relative importance of the Farm Park has increased. Its own main difficulty was its dependence on the weather. The lack of undercover facilities in the farm park undermined the sustainability of the enterprise as a visitor attraction and educational establishment. There were insufficient under cover areas to accommodate the 500 schoolchildren a day that visit the site on a regular basis during school term time as well as visitors over weekends and in school holidays. Visitors came when dry weather is forecast, but not otherwise. The very heavy rainfall from May to July 2007 and the wet Easter and summer holidays the following year had a severe impact on a labour intensive business such as this. This has now been partly rectified by the introduction of a larger indoor play centre and improved catering (see below), but there remains a need to continue to upgrade and expand the covered facilities.

14. The fall in the number of visitors to the Shopping Village can be attributed to a number of factors – notably a decline in interest in craft/antiques (the vogue for contemporary design), competition from numerous garden centres transformed into large under cover country department stores and the accessibility to the big high street chains of increasingly good quality, low cost products from the Far East (which, of course, make hand crafted products price prohibitive) together with the absence of a shoppers’ catering facility that met modern customer expectations.

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

numbers. Planning permission was granted on 16 September 2009. A Garden Centre was opened in July 2010, and a new indoor play area and shoppers' restaurant were opened in November 2010.

20. Since the development of the additional indoor space, both day visitors and membership to the Farm Park have increased during inclement periods and visitors have increased to approximately 270,000 in 2011, primarily due to an increase in membership visits from ages 4 to 10.
21. The opening of the Garden Centre has also reversed the decline in visitor numbers to the Shopping Village, although customer spend does not appear to be matching the visitor increase. It is considered that the shift away from retail and towards the visitor attraction is therefore continuing.
22. The total number of visitors to HCW in the 12 months to March 2012 was circa. 505,000 of which 270,000 were Farm Village visitors and. This not only reinforces the overall and continued downward trend in overall visitor numbers between 2002/3 and 2011/12 (a fall across the period of 199,000) but the overall decline in visitors to the Shopping Village, and the relative change in the importance of the Shopping Village in comparison to the Farm Village with its proportion of overall visitors falling from 70% to around 46% in the same period.
23. The owner of the Hatton Estate is mindful of the Council's stated desire to increase the number of overnight stays within the District. A recent review of the business has concluded that the introduction of tourist accommodation at the Hatton Experience, in the form of camping, self-catering lodges and rooms at the Hatton Inn would assist with the long-term viability of the business and would fulfil Objectives 1 and 3 above. Accommodation has been introduced at a large number of visitor attractions of a similar scale to the Hatton Experience in recent years, as a way of increasing spend to offset the decline in visitor numbers, securing the long-term viability of tourism businesses and increasing staying (and therefore higher spending) visitors in an area. It also has the effect of extending the season, securing jobs. This has proved very successful at other sites and, initial reports from other operators in 2012, is that whilst day visitors have been hit badly by the persistent poor weather this summer, staying visitors have held up and have therefore increased the importance of

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.

- Comprehensive review of the remainder of the Hatton Estate, to support appropriate rural business development and to identify parcels of land that could accommodate residential development adjacent to the settlements of Hatton Park and Hatton Station. In particular it is considered that residential development at an appropriate scale close to Hatton Station could help meet the district's housing requirements in a sustainable way.
 - General support for rural tourism, the continued sustainable growth of rural tourist attractions and support for rural accommodation where it relates to an existing attraction and which can provide a different type of accommodation to that found in urban areas, providing choice for visitors to the area.
25. We consider that there is substantial policy support for employment and wealth creating development in Government policy generally and for tourism in particular. At the highest level, the Ministerial Statement of 23 March 2011, Planning for Growth, supports sustainable economic development, and this is reflected in the NPPF. More specific support is provided by the Good Practice Guide for Tourism which remains extant, and the recently published Government Tourism Policy 2011.

The Preferred Options Document

Tourism

26. Further to our previous representations we welcome the fact that the Preferred Options document now acknowledges the importance of Culture & Tourism to the District with the provision of its own section. Indeed, we particularly welcome specific acknowledgment of Hatton Country World as an attraction. (It may be appropriate to change the reference to 'The Hatton Estate' so that it encompasses all the tourism activities on the site, including the Hatton Arms and the network of permissive footpaths, and does not become out of date should the branding of the site change again).
27. Overall the Culture & Tourism section is reasonably positive in outlook and we welcome the acknowledgement that that tourism is a key part of the local economy; and one which the Council should both promote positively and

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:

The Council will consider applications for tourism-related development at the Hatton Estate favourably, where such development would upgrade and improve the viability of the attraction; are appropriate to its function as a major tourism destination; make a positive contribution to the local economy; and are acceptable taking into account its location in the Green Belt.

31. We support the Council's approach to developing a strategic policy for tourism accommodation providing it is preceded by the above text to ensure that it is clear that the policy does not solely support the development of new tourist accommodation but also supports the further development and expansion of existing tourist attractions.

Green Belt

32. In our previous representations we sought the inclusion of the site as Major Developed Site in the Green Belt in order to complement the site's inclusion within the tourism policy as set out above in paragraph 34. However, we note that the concept of Major Developed Sites in the Green Belt is no longer specifically provided for in the NPPF, nor is the necessity to identify such sites within the Local Plan. Instead, paragraph 89 of the NPPF identifies that the ***“partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”*** is appropriate within the Green Belt.
33. The Council is continuing to make reference to “major developed sites” in Policy PO16. There is nothing in the NPPF that suggests that the Council cannot continue to identify major developed sites; however, we consider it may be more appropriate to identify ‘previously developed sites’ in the Green Belt where limited infilling would be acceptable, to replace the ‘major developed sites’.
34. On this basis, we suggest that the Local Plan should have a policy which identifies the key previously developed sites, including the main developed part of the Hatton Estate (the Farm Village and Shopping Village), in the same

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

approach unless it can be objectively demonstrated that it would lead to significant adverse impacts. Indeed, paragraph 52 of the NPPF states that:

“The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.

39. Accordingly, meeting the needs of the housing market area should not be so readily disregarded without objectively assessing the potential of housing sites on the edge of settlements or within the countryside/Green Belt. Indeed, we note that policy PO3 already identifies that development may be needed on the edge of existing urban areas.
40. In addition, whilst the Local Plan must be based on the administrative area, the need for housing and other development arises from settlements and housing market areas, not administrative areas. In this context the Local Plan must indicate the extent to which (if at all) it is intended to help meet the needs of Coventry, which is tightly bounded in most directions, in relation to those of Warwick, Leamington and Kenilworth, which themselves have a substantial population, of around 105,000 on the basis of the Locality Profiles in the SASR. This is especially so in the anticipated post-RSS era, and its replacement with the duty to cooperate with neighbouring authorities introduced through the Localism Act 2011 and the provisions of the NPPF (paragraph 157).
41. We are therefore concerned that the level of housing identified will not be sufficient to meet the objectively assessed needs.
42. Finally, the Council's approach to the Distribution of Sites for Housing through policy PO4 is broadly welcomed in principle, because it envisages new housing in rural villages as well as further development in the main settlements. However, the scale of housing development identified for Hatton (and it is not clear if the reference to 'Hatton' in the Plan includes Hatton Station and Hatton Park) is low given the potential availability of small scale extension sites. In this regard, our client has circa. 4.5Ha of land across three sites (see site Plan) on the edge of Hatton Station, and a further site on the edge of Hatton Park which would be able to deliver sustainable communities

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.