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Sent via post and email to ikemp@icloud.com

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Our ref 03499/NT/RDv/12574199v1
Your ref Matter 10 (respondent ref. 192)

Dear Mr Kemp

Warwick District Council: Local Plan Examination: Further Statement on behalf of Warwick Castle (192) in relation to Matter 10, Culture, Leisure and Tourism

On behalf of our client, Warwick Castle (respondent ref. 192), we set out below a statement in response to the Inspector's Question no. 3 in relation to Matter 10: Culture, Leisure and Tourism. The 'issue' for Matter 10 is identified as:

"Whether the approach towards culture, leisure and tourism is justified, effective and consistent with national policy."

Question no. 3 states:

"Is Policy CT7 justified in its approach? Does it provide adequate safeguards in terms of heritage assets and the vitality and viability of the Town Centre? Is it sufficiently flexible? Should it more clearly separate out the approach to Warwick Castle and the Racecourse/St Mary's Lands? What is the current situation regarding masterplans and specific development proposals?"

As we identified in our previous representations (dated 27 June 2014), Warwick Castle does not consider the Local Plan is sound as it is inconsistent with National Policy.

Background

The Grade I 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 began in 2015 was at a cost of £1million and will take around 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. Our 2014 representations identified that 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, we set out below a response to Question 3 on behalf of Warwick Castle.

The NPPF requires Council's to take a proportionate approach in the information sought, in various situations. This applies to heritage related projects (paragraphs 123 and 158, for example) and a Conservation Plan may be proportionate if the Masterplan seeks significant scale of works. The policy does not need to be so prescriptive to request a Conservation Plan. Whilst this may be a desirable document, it may not be necessary as part of preparing/agreeing a 'masterplan'. The need for such a document will become clearer as the masterplan is prepared. The scope of document(s) prepared will drive the need for a Conservation Plan.

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

Is Policy CT7 justified in its approach? Does it provide adequate safeguards in terms of heritage assets and the vitality and viability of the Town Centre? Is it sufficiently flexible?

We do not consider that the policy, as currently drafted, is justified in its approach, nor is it sufficiently flexible. 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. 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 endeavours. 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.

In light of the above we recommend that the following amendments are made to Policy CT7 and the supporting text relevant to Warwick Castle to ensure it is consistent with National Policy (deletions are struck-through and additions are in red and underlined):

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~~ which accords with National Policy and other relevant policies in this Plan will be supported. The Council will also 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 impact on 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 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.

What is the current situation regarding masterplans and specific development proposals?

Since the Castle's last representations in 2014, planning permission has been granted for the following proposals:

- 1 Erection of 16 permanent semi-detached lodges (32 units) with associated facilities building, sub-station, boardwalks, landscaping and associated infrastructure works on Land at Foxes Study – granted in October 2015 and the development has since commenced with the first tranche of lodges opening earlier this year.
- 2 Use of land as a temporary medieval glamorous camping site for approximately 5 months between 1 May and 30 September each year up to and including 2017 on Land at Foxes Study – granted in February 2015 and the development has since commenced with glamping in operation in 2015 and 2016.



These developments were each assessed on their own merits in accordance with relevant local and national planning policy taking into full account the impact on the heritage asset. We consider that there will continue to be a basis on which to determine further development proposals should they need to come forward in advance of a masterplan being agreed.

Since submitting the representations in June 2014, there have been a number of discussions with WDC and Historic England about various ideas for the medium term development at the Castle. These have yet to be crystallised as a masterplan. As our previous representations explained, preparing a masterplan will take several months – at least. We are unlikely to be in a position where this is agreed before mid-2017.

Whilst Warwick Castle wants to progress the masterplan, in dialogue with the local council and other groups in the area, the policy in the Local Plan ought to be worded to allow individual applications for development at Warwick Castle to be considered against other relevant policies and material considerations, in advance of a masterplan. Whilst we are optimistic that an agreed plan can be produced, the Local Plan should not create a policy vacuum, whilst such a document is being prepared.

Should it more clearly separate out the approach to Warwick Castle and the Racecourse/St Mary's Lands?

Whilst Warwick Castle does not object to the policy also referring to Warwick Racecourse, the draft policy makes very limited reference to the Racecourse. Accordingly some minor alterations make the policy applicable to both (as we have indicated above). 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.

Summary

This statement has responded to the Inspector's Question no. 3 in relation to Matter 10. To ensure Policy CT7 is sound (consistent with National Policy) the suggested amendments to the policy should be considered.

Please keep us informed of any response by the Council or the Inspector to this Statement as the Examination progresses and in advance of the relevant Hearing Session in December.

Yours sincerely

A handwritten signature in black ink that reads 'N. P. Thompson'.

Nicholas Thompson
Senior Director

Copy Nick Blofeld - Warwick Castle