

MATTER 9**Statement on behalf of Trentham Leisure Limited****ENVIRONMENT (POLICIES N1-N9)*****Key issue:***

Does the Plan provide an appropriate, effective and soundly based framework for protecting, maintaining and enhancing the high quality environment within Stafford Borough, including design, climate change, renewable energy and the natural and historic environment, including landscape and sites of nature conservation importance, particularly Cannock Chase SAC & AONB, which is fully justified with evidence and consistent with national policy?

9.5 LANDSCAPE CHARACTER & HISTORIC ENVIRONMENT (Policies N8-N9).**b) *Should the Plan include a specific policy covering new development at Trentham Estate and Gardens?***

1.1 Our Client welcomes the broader Policies N8 and N9 that are concerned with the conservation, protection and enhancement of landscape character and sustaining and enhancing the historic environment, including Registered Parks and Gardens, Conservation Areas and Listed Buildings, all of which are highly relevant to The Trentham Estate and Gardens. However, we consider the policy is too inflexible in its current form and does not reflect the guidance set out in Section 11 'Conserving and Enhancing the Natural Environment' of the NPPF. More specifically, Paragraph 116 of the NPPF states:

'Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;**
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and**
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.'**

1.2 Turning to the first criterion above, the 2001 Outline Planning Permission for pertains to the Estate was tested at a Public Inquiry. Paragraph 14.45 of the

corresponding Inspector's Report acknowledges the need for the approved quantum of enabling development at the Estate in the absence of other generators of finance. It states:

'No other suitable major generators of finance have been suggested, capable of achieving the SBLP* objectives for Trentham Gardens. To succeed in this, in my opinion, the likelihood is that a substantial retail element as now proposed would be needed as part of the comprehensive scheme, both to assist with finance directly and to ensure on-going maintenance of the heritage asset.'

(*Stafford Borough Local Plan).

- 1.3 The above is reinforced by Paragraph 14.85, in which the Inspector states that the 'amount of enabling development is the minimum necessary to secure the future of the heritage asset'.
- 1.4 Given that not all of the enabling development approved through the Outline Planning Permission (which is now time expired) has come forward, primarily as a consequence of the economic downturn, it is apparent there is still work to be done at The Trentham Estate and Gardens to ensure its continued regeneration and restoration. A site-specific policy that is tailored to the needs of The Trentham Estate and Gardens and directs development towards the most appropriate parts is key to ensuring a positive approach to this sensitive landscape and heritage asset. This would provide a suitable mechanism in which to ascertain the quantum of development required and assess the impact of development on the landscape and historic environment.
- 1.5 Policy N9, as currently drafted, does not provide the flexibility afforded by adopted Local Plan Policy RLT19 (see Appendix 1), which requires a 'balance of advantage' to be demonstrated. Furthermore, there is no specific guidance on the types of uses that would be considered appropriate at The Trentham Estate and Gardens, as is set out in Policy RLT20 (see also Appendix 1). We believe these are effective in determining development proposals at The Trentham Estate and Gardens. In fact, the Inspector commended the policies' effectiveness and the significant weight attributed to them when the 2001 Outline Permission was being appraised in 2001, at Paragraph 14.17 of his Report. Therefore, given the incomplete nature of The Trentham Masterplan and the Applicant's ambitions to continue with the restoration works, it is considered that their removal as part of this plan-making process would be regrettable and counterproductive. In light of the sensitive nature of the Site, it is important that new development is focussed and deliverable, which could be compromised through an over-reliance on the broader strategic policies contained in the Draft Plan.

Requested Change

- 1.6 We request a site-specific policy for The Trentham Estate and Gardens.

'New Development at the Trentham Estate and Gardens

The Trentham Estate and Gardens is a recreation, leisure, tourism and visitor attraction. Limited development and appropriate infilling will be permitted within the northern area of the estate (as defined on the Plan in Appendix H) for the following range of uses:

- **Outdoor sport and recreation**
- **Indoor leisure and entertainment facilities**
- **Hotel-Conference Centre**
- **Exhibition facilities**
- **Heritage/recreation/craft related retailing**
- **Visitor facilities**
- **Justified enabling development.**

Development at the Trentham Estate and Gardens must meet the following criteria:

- a) **Conserve the natural and historic environment including existing buildings, gardens, landscape, flora and fauna;**
- b) **Enhance recreation / leisure facilities within the Borough;**
- c) **Limit the impact on the highway network;**
- d) **Meet the principles and objectives of the Green Belt'.**

- 1.7 The wording of the above policy responds positively to the NPPF guidance. This includes Paragraph 134, which allows for the environmental impacts of any future development to be weighed against the public benefits of the proposal, thereby securing its optimum viable use. It also responds positively to the guidance contained in Paragraph 140 as it allows for an appraisal of any enabling development to secure the future conservation of heritage assets to be considered against the disbenefits of departing from other policies. With reference to plan making, the recently published National Planning Practice Guidance confirms that:

'In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the asset.'

- 1.8 We believe that this represents a Minor Change given that the site-specific policy was subject to consultation and a Sustainability Appraisal in relation to the inclusion of Policy DM24 in the Local Plan for Stafford Borough Draft Publication (see Appendix 2).

- 1.9 We have contacted Alan Taylor of English Heritage who has given his support for a site-specific policy at The Trentham Estate and Gardens. Unfortunately, due to a family bereavement, he has not provided a written response confirming these views in time for the deadline; however, this will follow and form Appendix 3.
- 1.10 This supports the case for the retention of a site-specific policy to recognise the need for ongoing management, restoration and regeneration of The Trentham Estate and Gardens.

Barton Willmore
10th October 2013