

MATTER 6**Statement on behalf of Trentham Leisure Limited and St. Modwen****ECONOMY (E5 and E6)*****Key issue:***

Does the Plan set out a clear economic strategy which positively and proactively encourages sustainable economic growth, and are the policies for the local and rural economy, tourism and canals, town, local and other centres soundly based, effective and appropriate for Stafford Borough, supported by a robust, credible and up-to-date evidence base and consistent with national policy?

6.2 MAJOR DEVELOPED SITES IN THE GREENBELT (Policy E5)

c)i) *Is the approach to Major Developed Sites in the Green Belt, including Hadleigh Park, Moorfields Industrial Estate and former Meaford Power Station, appropriate, justified, effective, soundly based and consistent with national policy?*

- 1.1 St. Modwen fully supports the provisions of Policy E5 and, in particular, the identification of the Former Meaford Power Station site as a major developed site in the Green Belt. This site is a large brownfield site which was formerly the Meaford Power Station and has planning permission for a significant volume of employment generating uses (copy attached at Appendix 1).
- 1.2 Paragraph 89 of the National Planning Policy Framework (NPPF) the partial or complete redevelopment of previously developed sites whether redundant or in continuing use providing that the development would not have a greater impact on the openness of the Green Belt and the purposes of including land within it.
- 1.3 St Modwen considers that the uses considered appropriate at the Meaford site should be expanded to include the provision of infrastructure development, particularly in light of the previous use of the site, its characteristics and surrounding context. The site is considered relatively remote from the nearest settlement and facilities, as is noted in Paragraph 7.14.9 of the Stafford Borough Local Plan 2001 Inspector's Report. This provides a local justification as to why residential uses were discounted at Meaford. Notwithstanding this, Paragraph 7.14.10 of the Inspector's Report advocates a more flexible approach to development at the site.
- 1.4 Accordingly, we consider the characteristics of the site provide an opportunity to utilise it for infrastructure development in line with the guidance contained in National Policy Statements (NPSs), as set out in the letter issued to Chief Planning Officers by the Department for Communities and Local Government (CLG) on 9th November 2009 (copy attached at Appendix 2). In particular, the overarching National Policy Statement for Energy (EN-1) sets out the need for new nationally significant electricity infrastructure projects. The key objectives, set out in Paragraph 2.2.20, are to ensure sufficient electricity capacity to meet demand at all times; ensure reliable supply chains and a diverse mix of technologies and fuels.

Proposed Change

- 1.5 In light of the above, we request the following revisions to Policy E5 to make the policy consistent with the NPPF and CLG guidance:

The following sites will be identified as previously developed sites (whether redundant or in continuing use, excluding temporary buildings) within the Green Belt, where limited infilling or the partial or complete redevelopment will be supported for employment **or infrastructure development** consistent **with relevant National Policy Statements**, and Spatial Principle SP7, 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;

- Hadleigh Park (Former Creda Works Limited), Blythe Bridge.
- Moorfields Industrial Estate, Swynnerton.
- Former Meaford Power Station, Meaford, Stone.

- 1.6 We would also request that Paragraph 9.21 is amended as follows:

There are also a number of significant brownfield sites located in the North Staffordshire Green Belt, known as Major Developed Sites. In order to encourage re-development of these areas for new employment provision, to support inward investment and job creation opportunities in the North Staffordshire conurbation, these are identified on the Proposals Map at Hadleigh Park (previously known as Creda / Indesit works), the former Meaford Power Station, and Moorfields Industrial Estate. **In assessing redevelopment proposals of the Former Meaford Power Station site the Council will relate the proposals to the previously existing development of the site.**

6.3 TOURISM (Policy E6)

- b) ***Should the Plan include a site-specific policy to support restoration and regeneration with new development at Trentham Estate/Gardens?***

- 1.7 The Trentham Estate and Gardens is a premier UK tourist attraction and makes a valuable contribution to the local economy. Whilst Trentham Leisure Limited recognises the benefits of Policy E6, in terms of providing a wider tourism policy that responds to Paragraph 28 of the NPPF, it is considered that a bespoke policy is required to provide more flexibility to enable the specific development needs of The

Trentham Estate and Gardens to be recognised and managed effectively. A site-specific policy, similar to that contained in The Plan for Stafford Borough Draft Publication, which was consulted on between September and October 2011 (extract contained at Appendix 3), will support its ongoing restoration and regeneration, thereby strengthening the tourism offer of the Borough.

- 1.8 Trentham Leisure Limited gained Outline Planning Permission for a comprehensive mixed-use masterplan in 2001 (Reference: 97/35257/OUT). This was based upon a 10 year restoration and regeneration programme going forward. Importantly, the quantum of development approved was tested at Public Inquiry and the Inspector agreed that the level of enabling development was appropriate to enable the Estate's restoration/regeneration/management and long term financial sustainability. In the Inspector's Report for the Outline Planning Permission, dated 22nd June 2001, the Inspector states at Paragraph 14.100:

'It seems to me that the scheme as proposed strikes a realistic balance that is appropriate to the special qualities and potential of the estate and the surrounding area and present day visitor demands.'

- 1.9 Following approval of the Outline Planning Permission, elements of the masterplan have since been approved through reserved matters submissions, and subsequently implemented, including a garden centre and a proportion of the retail village. However, the outline planning permission expired in November 2012 without all of the elements being delivered. This was largely as a result of the recession since 2007/8. Based upon the Inspector's conclusions at the time Planning Permission was granted, there is a danger that the level of completed development is not sufficient to allow the continued restoration and regeneration works at the Estate. Paragraph 14.99 of the Inspector's Report states:

'There is a general regret that the estate has declined and a realisation that significant investment must be generated if its attractiveness is to be restored.'

- 1.10 It is imperative, therefore, that an effective planning policy is in place to assist in delivering the remainder of the enabling development in a manner that enables a balanced assessment of the plethora of competing aims and interests affecting the Estate. The overarching objectives of the Estate have not changed since 2001 and Trentham Leisure Limited remain committed to bringing forward development that will reinforce and strengthen its tourism offer. This includes the restoration and re-use of the listed and vacant Trentham Courtyard and Park Drive Cottage restoration of Trentham Hall, which is a shared objective with English Heritage and Stafford Borough Council, as evidenced in the Trentham Conservation Area Appraisal (February 2013).
- 1.11 At the time of the Public Inquiry in 2001, the Inspector noted the effectiveness of Policies RLT19 and RLT20 in setting out a framework under which the plan promotes development of The Trentham Estate and Gardens as a major tourist/recreation and leisure destination. These were seen as instrumental in assessing the proposals and

we consider that the criteria set out in Policy RLT19 are still relevant and highly effective. In Paragraphs 4.8-4.9, the Inspector states:

'It was with a view to arresting and reversing decline that the Council included Policies RLT19 and RLT20 in SBLP. The Council acknowledged in Paragraph 6.8.1 that the intended development would comprise 'major' recreation, tourism and leisure proposals. Paragraph 6.8.6 also addresses the important issues of conservation of the historic buildings and natural environment.'

- 1.11 In light of the above, we consider a site-specific approach needs to be retained and included in the emerging Local Plan for Stafford Borough to guide future development at the Estate. At Paragraph 9.28.2 of the Stafford Borough Local Plan 2001 Inspector's Report it is confirmed that:

'In the light of the historic importance of the estate, which also contains two SSSIs, and its function as a major focus for recreational and leisure activities, together with its likely impending disposal, it seems to me that there ought to be a site specific policy in the Plan. As I see it, it is particularly important that such a policy should provide a framework to facilitate the continued realisation of the recreational and tourism potential of the estate, but in a manner which ensures that its historic and natural attributes are safeguarded.' (our emphasis)

- 1.12 The sensitive designations, referenced above, have not been removed and there are no apparent reasons brought about by the publication of the NPPF that explain why the requirement for a site-specific policy relating to The Trentham Estate and Gardens is no longer required. We believe that future development should be directed to the 'northern core' area, as defined in the adopted Local Plan, so as to avoid any harm to the more sensitive southern areas of the Estate. As such, a supplementary plan was submitted as part of our February 2013 representations (enclosed at Appendix 4).

Requested Change

- 1.13 We request the following site-specific Policy for The Trentham Estate and Gardens be added to the plan.

'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’.**

1.14 We have reviewed the above proposed site-specific policy against the tests set out in Paragraph 182 of the NPPF. We consider this to be positively prepared, justified and effective. It is also consistent with the NPPF, particularly Paragraph 28 which supports sustainable rural tourism that benefits rural areas, communities and visitors whilst respecting the character of the countryside. This includes the provision and expansion of tourist and visitor facilities in appropriate locations. The above proposed policy would provide a suitable policy mechanism for assessing the suitability of tourism in this sensitive area.

1.15 The revised policy also reflects the guidance in Paragraph 154 of the NPPF, which states that Local Plans should address the implications of economic, social and environmental change and set out opportunities for development and clear policies on what will or will not be permitted and where. Furthermore, it accords with Paragraph 156 which states:

‘Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver...the provision of retail, leisure and other commercial development.’

1.16 Our request is to continue with a site-specific policy in the Trentham Estate and Gardens and, indeed, a similar policy (Development Management Policy 24) was proposed in the Draft Publication of the Plan. A site-specific policy has been effective in assisting with the restoration of The Trentham Estate and Gardens and contributing to the tourism offer in the Borough. The local authority, therefore, has seen merit in including a site-specific policy and there is no written explanation as to the change in their approach. We consider there is still merit in continuing with a site-specific policy in relation to this important site.

Barton Willmore
10th October 2013