

ISSUE 6**STATEMENT ON BEHALF OF TRENTHAM LEISURE LIMITED AND ST. MODWEN****PROTECTED EMPLOYMENT AREAS AND TOURISM****6.3 Is there a need for a policy to address the future of Trentham Gardens?**

- 1.1 The success of The Trentham Estate and Gardens is an important accolade for the Borough and emerging planning policy needs to be flexible and responsive enough to allow appropriate development to support its continued restoration and regeneration, which will maintain its status as a premier UK tourist attraction which receives in excess of 3 million visitors per annum. In view of this, we support a policy that recognises the need to adopt a flexible and responsive approach to appropriate development at this location.
- 1.2 By way of background, Trentham Leisure Limited gained Outline Planning Permission for a comprehensive mixed-use masterplan in 2001 (Ref: 97/35257/OUT). This was predicated on 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 corresponding Inspector's Report, dated 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."

- 1.3 Since the grant of outline planning permission, there have been a number of reserved matters approvals that have been subsequently implemented. This includes a garden centre and parts 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 economic downturn and recession in 2007/8. This needs to be considered in the context of Paragraph 14.85 of the Outline Permission Inspector's Report, where he confirmed that the amount of enabling development permitted is the minimum necessary to secure the future of the heritage asset. As such, there is a danger that the level of completed development is not sufficient to allow the continued restoration and regeneration works at The Estate.
- 1.4 It is imperative, therefore, that an effective planning policy is in place to assist in delivering the remainder of the enabling development with a mechanism that facilitates a balanced assessment of the plethora of competing aims and interests (i.e. promoting tourism, leisure and recreation; protecting the Green Belt, heritage and landscape and enabling development). This was a view shared by English Heritage (now Historic England) at the time of The Plan for Stafford Borough (Part 1) Examination (see Appendix 1). 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 Cottages together with

the restoration of Trentham Hall all for residential use. At The Plan for Stafford Borough (Part 1) Examination, John Holmes, Stafford Borough Council's Development Manager, confirmed that conversion of Trentham Courtyard to residential would be an acceptable use for the Council. Indeed, the restoration of these listed buildings is a shared objective with not only Stafford Borough Council, but also Historic England as evidenced in their Trentham Conservation Area Appraisal (February 2013). Turning to the latter, Action 4 of the Appraisal states:

"Opportunities to secure the preservation and enhancement of buildings and structures of special interest in the Conservation Area will be pursued. The Council will encourage appropriate maintenance of historic buildings on a regular basis and consider using its powers to serve Urgent Works or Repair Notices where necessary. Particular attention will be given to the following buildings or structures at risk of further deterioration:

- **The remains of Trentham Hall, the grand entrance and orangery;**
- **The stable block and clock tower with the courtyard between them;**
- **The cottages at 1-4 Park Drive;**
- **The ice house on Park Drive;**
- **Gravel Pit Lodge;**
- **The three listed bridges within the park;**
- **The Garden Hut;**
- **The Tatham Lodges"**

1.5 The sub-text to Action 4 refers to the following:

"The remains of Trentham Hall is Grade II* listed and classed in poor condition in the English Heritage Register of Buildings at Risk. It is owned by Trentham Leisure and the outline planning permission foresaw its restoration in the context of a redevelopment of the site as a conference hotel. Trentham Leisure also own the Stable Block, Sculpture Gallery and Clock Tower, 1-4 Park Drive and the listed bridges. A Restoration and Management Plan for these and other listed structures was prepared in 2003. Some of the work identified within the Plan under phase 1, for completion in Spring 2004, has been completed. There is no time frame for completion identified within the Plan for the restoration of many of the structures. The preparation of a detailed Conservation Management Plan for the remaining structures may be an appropriate next step."

1.6 At the time of the Public Inquiry in 2001, the Inspector noted the effectiveness of Policies RLT19 (Accommodating New Development at Trentham Garden Estate) and RLT20 (Appropriate Infill Uses at Trentham Estate and Gardens) of the now superseded Stafford Borough Local Plan 2001 in providing a framework within which development at The Trentham Estate and Gardens could be assessed (policies attached as Appendix 2). The reason for including the aforementioned policies in the 2001 Local Plan is set out in Paragraph 9.28.2 of the Inspector's Report, issued in January 2007, which states:

"The estate is a significant leisure resource within the Borough and sub-region and over the last 50 years has developed a wide variety of visitor uses associated with recreation, leisure, conference, exhibition, banqueting and entertainment. The site is not currently meeting its full recreational potential and

requires upgrading and improvement. It has potential for a wide range of leisure uses and expansion of its historic buildings, gardens and landscape”.

- 1.7 The fundamental objectives of the Estate remain the same as those considered when the 2001 local plan policies were being formulated. These were seen as instrumental in assessing the proposals and we consider that a similar site-specific policy would still be highly relevant and 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.”

- 1.8 In light of the above, we consider a site-specific approach needs to be incorporated in the emerging Plan for Stafford Borough (Part 2) to assist in guiding future development at The Estate. This would provide a consistent and focussed approach to assist with the fulfilment of the objectives of the Estate and provide certainty for those seeking to bring this forward. Indeed, at Paragraph 9.82.2 of the Stafford Borough Local Plan 2001 Inspector’s Report it was confirmed that:

“In 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)

- 1.9 Notwithstanding this, and despite representations made by Trentham Leisure Limited supporting a site-specific policy, the Inspector for the Plan for Stafford Borough (Part 1) concluded at Paragraph 109:

“...There is some pressure to include a site-specific policy for Trentham Estate and Gardens, similar to those in the adopted Local Plan [F14: RLT19-20], but since most of the regeneration, restoration and enabling development envisaged in earlier proposals has been completed or approved, there is now little need for a strategic policy for this site; further proposals could be considered against national policy guidance, English Heritage policy, Green Belt policy and other policies in this Plan, and the need for a site-specific policy could be reconsidered in subsequent Site Allocation or Neighbourhood Plans.” (our emphasis)

- 1.10 This is reiterated at Paragraph 144 which sets out:

“...any future proposals would need to be considered against a wide range of national and local policies. For the reasons given earlier, a strategic site-specific policy is not fully justified in this Plan, but could be reconsidered at the Site

Allocations/Neighbourhood Plan stage, if necessary.” (our emphasis)

- 1.11 We therefore consider it highly appropriate to include a site-specific policy within the Plan for Stafford Borough (Part 2) in order to guide future development. A site-specific policy is essential to ensure that the principles established are protected to maintain The Estate’s long term financial sustainability.
- 1.12 Given that significant elements of the masterplan are still to be completed it is considered imperative that The Plan for Stafford Borough (Part 2) recognises the established use, the extant permissions yet to be implemented and the need to complete The Estate that would positively encourage its continued use and restoration, as well as the contribution it makes to the local economy through a site-specific policy.
- 1.13 Without such a site-specific policy, the remaining development to be undertaken at The Estate would need to comply with the generic policies contained within the Plan for Stafford Borough (Part 1) (June 2014), in particular Policies E6 (Tourism), N8 (Landscape Character) and N9 (Historic Environment). In our view, the broader strategic policies contained in this adopted document do not provide sufficient flexibility to deliver the essential enabling development that was delivered under the now time expired outline planning permission. For example, the Trentham Conservation Area Appraisal (January 2013) states that opportunities to secure the preservation and enhancement of buildings and structures of special interest, such as Trentham Hall, Trentham Courtyard and Park Drive Cottages, should be pursued. The remains of Trentham Hall are listed on Historic England’s ‘Buildings At Risk’ Register 2014 whereas Trentham Courtyard and Park Drive Cottages are in a deteriorating condition. Given the sensitive nature of the buildings and need for urgent repair work, it is important that there is an emphasis on delivery which would be aided by a focussed, site-specific policy. The concern is that a reliance on the broader strategic policies may act as an impediment to any heritage-led regeneration at the Estate. Indeed, these concerns are substantiated following the assessment of the Trentham Hall and Courtyard Site as being ‘not currently developable’ in the Strategic Housing Land Availability Assessment (SHLAA) 2015 despite support for development through the Conservation Area Appraisal objectives and from Historic England.
- 1.14 The policies contained within Plan for Stafford Borough (Part 1) referenced above, whilst compliant with the overarching objectives of the NPPF, are prescriptive and not considered specific enough to deal with the complex and, at times contradictory aims associated with the redevelopment of The Estate and the supporting financial sustainability of the restoration of the heritage assets within the site itself.
- 1.15 There was evidently a justifiable need for a site-specific policy relating to The Trentham Estate and Gardens in the previous Stafford Local Plan 2001 (Policies RLT19 and RLT20) to sit alongside the overarching policies relating to the protection of the Green Belt (Policy E&D10), adaptation and re-use of rural buildings (Policy E&D17), the protection of the historic environment (Policies E&D18, E&D19, E&D23, E&D24, E&D25 and E&D35), landscape protection (Policies E&D28, E&D29 and E&D30) and tourism (Policy RLT4). Given the underlying objectives remain the same we cannot see why the current situation would be any different.
- 1.16 We consider that a site-specific policy for The Trentham Estate and Gardens would embody the relevant requirements to safeguard relevant assets from inappropriate development whilst recognising the unique and diverse needs of the Estate to ensure an appropriate balance is

struck between the provision of enabling development and the safeguarding of such heritage assets. As was previously set out under the site-specific policy in the now superseded Stafford Borough Local Plan 2001, the focus for development will remain around the northern core area of The Estate, where development is focused away from the most sensitive areas of the site in terms of both heritage and landscape. The rationale for this is evident in Paragraph 9.28.9 of the Inspector's Binding Report into the superseded Local Plan 2001, which states:

"I accept that the core area identified by the objector includes key areas such as the formal Italianate gardens between the lake and the remains of the former house, together with areas of tree cover and landscaping. Nonetheless, while the prospect of development over the whole of this area would have serious and adverse consequences, I consider its boundaries are reasonably well defined; the area is somewhat distinct from the less formal landscape beyond it. Great care would need to be taken to ensure that any development did not impinge upon what I regard as highly sensitive surrounds and I would not wish to countenance development on all the land within this area. Nonetheless, my view is that the area defined by the objector is not excessive and the suggested policy is sufficiently robust to ensure that its distinctiveness and valuable qualities are safeguarded..."

- 1.17 We consider the concept of the northern core area (see Appendix 3) still has relevance in terms of directing future development towards the most appropriate parts of the Estate and away from the more sensitive, open areas and ecological designations located to the south. It has been effective in ensuring the development proposals, granted as part of the 2001 Outline Planning Permission, are concentrated in less sensitive areas that were in need of regeneration. It also seeks to keep built development closer to the settlement boundary, prevents significant encroachment into the Green Belt and prevents unrestricted sprawl.
- 1.18 Trentham Leisure Limited are currently in the process of preparing a vision document to guide development in the Northern Core area of the Estate and will be engaging with Stafford Borough Council and Historic England in the near future on how best to take these proposals forward. A site-specific policy would complement this process and provide greater certainty that these proposals can be delivered in a sensitive and sustainable manner.
- 1.19 Mindful that the Inspector for the Outline Permission concluded that the amount of enabling development permitted was the minimum necessary to secure the future of the heritage asset and some elements of the Masterplan were not delivered, there is evidently still a need for enabling development at The Estate. Following the expiry of the Outline Permission in November 2012, the principle of any new development proposals at the Estate would need to be re-assessed. There is, therefore, a need for an effective site specific mechanism within Stafford Borough's Development Plan to enable this to occur. It is important that the Development Plan recognises the established uses at The Estate and the need to complete the masterplan as this would positively encourage its continued use and restoration, as well as recognising the invaluable contribution it makes to the local economy.
- 1.20 Based on the above and the progress made so far on the Estate, an updated Policy, that is substantially similar to previous policies RTL19 and RTL20 would provide an effective framework for the determination of future proposals at the Estate. We would therefore propose the following

wording to encompass such a site-specific policy for inclusion within The Plan for Stafford Borough (Part 2):

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 **) for the following range of uses:-

- **Outdoor sport and recreation**
- **Indoor leisure and entertainment facilities**
- **Hotel-conference centre**
- **Exhibition facilities**
- **Heritage/leisure/recreation/craft related retailing**
- **Visitor facilities**
- **Associated enabling new development including the re-use of Trentham Hall/Trentham Courtyard for residential purposes.**

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.**

1.21 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 Paragraph 28 which supports sustainable rural tourism that benefits rural areas, communities and visitors whilst respecting the character of the countryside. Furthermore, it is also aligned with Paragraph 154 of the NPPF confirms that Local Plans should address the implications of economic, social and environmental change and that Plans 'should set out opportunities for development and clear policies on what will or will not be permitted and where'. Similarly, Paragraph 157 goes on to state that Local Plans should:

"allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate."

1.22 This supports the case for a bespoke, site-specific policy that is required to ensure that the remaining development set out within the 2001 masterplan is able to come forward to in a sensitive and sustainable manner to ensure continued redevelopment and restoration of the Estate. This is an appropriate response to the Estate's unique set of circumstances. It must enable a balanced assessment of the plethora of competing aims and interests affecting the Estate in line with the presumption in favour of sustainable development

Word Count: 2981

APPENDIX 1
ENGLISH HERITAGE EMAIL

Ben Taylor

Subject: FW: Site Specific Policy, The Trentham Estate and Gardens, Local Plan for Stafford Borough (20348)

From: Taylor, Alan [<mailto:Alan.Taylor@english-heritage.org.uk>]

Sent: 14 October 2013 14:08

To: Ben Taylor

Subject: RE: Site Specific Policy, The Trentham Estate and Gardens, Local Plan for Stafford Borough (20348)

Ben

Thank you for your e-mail and for discussing the matter with me on 11 October. I am sorry that a family bereavement delayed my response to your original e-mail.

I confirm that EH does support inclusion of a site specific policy in the draft Stafford Borough Local Plan.

The Trentham Estate has a number of very site specific and longstanding heritage and conservation issues relating both to the to the preservation and upkeep of the RPG, the listed buildings, and the designated conservation area. Finding economic solutions to these issues can be challenging within the normal planning framework given the quasi-rural location of the estate in the Green Belt and adjacent to the A34 trunk road.

English Heritage has found the presence of a specific policy for Trentham Gardens in the local plan since the 1990s has been helpful in providing a clear and understandable framework for all parties to work within. We consider that it would continue to be useful to have a further policy along these lines continuing into the new generation plan. Our only comment on your draft text would be to make specific reference to listed or historic buildings, to the Registered Park and Garden and to the designated conservation area in the text rather than the more general wording currently shown to emphasise the significance of these elements.

Alan Taylor
Inspector of Historic Buildings
English Heritage West Midlands

APPENDIX 2
POLICIES RLT19 & RLT20

- 6.7.6 Development proposals should focus on the northern sector of this policy area. The Bowling Green which lies in the middle should be retained as should the open aspect of the southern sector with its views across the Canal to the washlands area.
- 6.7.7 Given the location of this area and its tourism/recreation potential, any development should include high quality landscaping. Sensitive landscaping could improve the environmental quality of this area and setting of the listed buildings. Development proposals could include some element of hard landscaping which could enhance the tourism/recreation potential of the area.
- 6.7.8 The main constraint to regeneration of activity in this area is the limited amount of land available for development. The area is physically constrained by the canal to the west and Crown Street/Newcastle Street to the east. There are also difficulties providing adequate access and additional car parking. Adequate provision should be made for pedestrian linkages to the town centre. Given the diversity of uses and landowners in the area, land assembly may be a constraint to any comprehensive redevelopment scheme.

Water Supply and Drainage

- 6.7.9 Severn Trent Water have stated that a water supply can be made available to this area. The Scotch Brook crosses this site in culvert to the south-east corner and development should not be permitted over or within 3 metres of the edge of this culvert.
- 6.7.10 Developers should ensure that capacity is available in the public foul sewage system for both foul and trade effluent discharges. Several public sewers cross this area and there should be no building over these sewers.

Highways and Access

- 6.7.11 Primary vehicular access is currently from Crown Street. The area under consideration is a narrow strip of land between the canal and Crown Street. Access into the area is difficult and limited. The car parking facilities at the canalside should be retained.

Hotel Development at Creswell

- 6.7.12 ***Proposal T2: Hotel Development: Land at Creswell, Stafford***

Land shown as T2 on the Proposals Map is allocated for hotel development.

- 6.7.13 Land adjacent to Junction 14 of the M6 at Creswell near Stafford has been the subject of unimplemented consents for the development of a hotel. This Plan now allocates that land for development of the approved hotel project.

6.8 The Trentham Gardens Estate

- 6.8.1 In addition to the specific land use proposals T1 and T2, this Plan also defines an area at the Trentham Garden Estate which is expected to be the

subject of major recreation, tourism and leisure development proposals. The Plan provides for such schemes through Policies RLT 19 and RLT 20.

- 6.8.2 The Trentham Gardens Estate is of “major heritage” significance extending to about 320 hectares. Within it are areas of woodland, gardens, various listed buildings associated with the former Hall, a conference centre and a range of leisure and recreation facilities.
- 6.8.3 The whole estate is an historic landscape being a grade II* Park in English Heritage’s Register of Parks and Gardens of Special Historic Interest. The estate also contains Sites of Special Scientific Interest at Kings and Hargreaves Woods.
- 6.8.4 The estate is a significant leisure resource within the Borough and sub-region and over the last 50 years has developed a wide variety of visitor uses associated with recreation, leisure, conference, exhibition, banqueting and entertainment. The site is not currently meeting its full recreational potential and requires upgrading and improvement. It has potential for a wide range of leisure uses and expansion of its historic buildings, gardens and landscape.
- 6.8.5 Policies RLT19 and RLT20 below set out the basic principles and criteria by which planning applications for The Trentham Gardens Estate will be assessed.
- 6.8.6 It is considered that development proposals within the range of uses identified in policies RLT19 and RLT 20 should form part of a comprehensive development strategy which also addresses the issues of conservation of the historic built and natural environment. This process would be assisted by the production of a planning brief which builds upon the parameters set out in the above policies.

POLICY RLT19 - ACCOMMODATING NEW DEVELOPMENT AT TRENTHAM GARDEN ESTATE

The Trentham Gardens Estate as defined on the Inset Proposals map is identified as a recreation, leisure, tourism, and visitor attraction.

All applications for development at the site will be assessed against the following criteria:

- (i) Conservation of the historic buildings, gardens and landscape.***
- (ii) Conservation of the natural environment including flora and fauna.***
- (iii) The enhancement of recreation/leisure facilities within the district/region.***
- (iv) Impact on the highway network.***
- (v) Effect on the purposes and objectives of Green Belt policy.***

(vi) The scale of economic benefits to the district.

(vii) Consistency with other policies in the plan.

In considering applications for development the Local Planning Authority will carry out an assessment against the above criteria and expect a balance of advantage to be demonstrated.

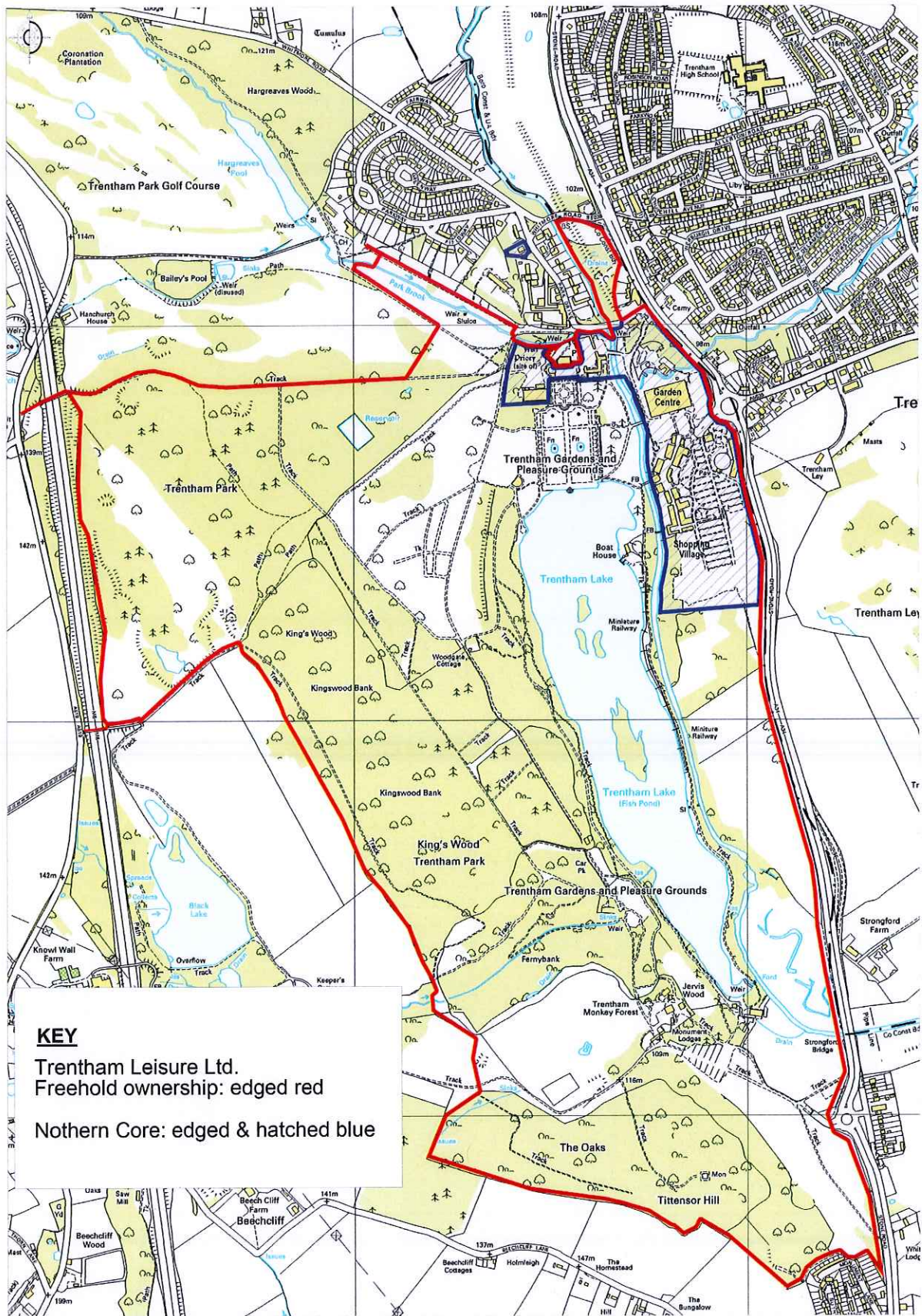
POLICY RLT20 - APPROPRIATE INFILL USES AT TRENTHAM GARDENS ESTATE

Subject to assessment against the criteria set out in Policy RLT19 development and appropriate infilling will be allowed within the northern area of the estate as defined on the Trentham Garden Estate Inset Proposal Map, 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.***
- ***Garden Centre.***
- ***Visitor facilities.***

APPENDIX 3
NORTHERN CORE AREA

The Trentham Estate, Trentham, Stoke-on-Trent.



KEY
 Trentham Leisure Ltd.
 Freehold ownership: edged red
 Nothern Core: edged & hatched blue