

Good Practice Guide to Planning for Tourism

Comments from Tourism South East

The redrafted document is a significant improvement on the version presented last year. It is a coherent statement of the processes and key issues to be considered in the development of tourism facilities. TSE welcomes the even handed approach to tourism development set out in the Guide that identifies the key role tourism plays in national, regional and local economies and the vitality and regeneration of urban and rural communities balanced against the need for appropriate development and good design.

We also welcome the emphasis on the collection, maintenance and interpretation of good data on tourism in a region or district to be used as an evidence base for tourism policies in Regional Spatial Strategies and Local Development Frameworks.

There are some specific comments on the draft:

Chapter 2

Para 2.5: tourism can drive rural diversification into environmental stewardship or access schemes as well as diversification into built facilities – the fourth point should make it clear that both these forms of diversification can benefit.

Chapter 3

Para 3.19: this should include a bullet point on local distinctiveness to ensure that planners consider and assess the appropriateness, design and relevance of the development in so far as it reflects the character of the local area

Para 3.20: It would be helpful to identify coastal areas as a separate category from “urban” and “rural” as they are distinct environments with the need for their own particular approach.

Para 3.24: an additional benefit of rural tourism is that it can educate the wider public about the management and history of the countryside and help to reconnect visitors with agriculture practice and local produce.

Para 3.25: in relation to large scale development in rural areas it would be worth stressing that the impact on smaller existing businesses should be considered within the economic benefits to ensure that new development is bringing new visitors to an area that has the capacity to cope with them, and not displacing existing visitor spend.

Chapter 4

Para 4.5: RTB's and DMO's will be the first logical point of contact for advice to assist planners in ensuring that the best cross section of industry representation is consulted.

4.11 We welcome this concentration on developing a good evidence base for decision making. While recognising that the national research programmes will provide relevant data for regional plans, local plans will need more detailed regional and local data. It would be helpful to add a paragraph in the opening part of this section, and in Appendix C (not Appendix 4 as written), about the best first point of contact for regional and local data being the relevant regional tourist board and/or destination management organisation.

Chapter 5

Para 5.1: Developments in rural areas should ideally be built using local materials and employ vernacular architectural designs to enhance their local distinctiveness. This should be mentioned as a separate bullet point.

Para 5.2: Start the paragraph here with “Pre-application discussions should be encouraged to ensure that hotel development schemes are tailored to destination and site need as well as the interpretation of local policy, helping to speed up the process and avoid unnecessary design and time wastage”.

Para 5.2: This would read better as “developers should” rather than “developers will” as not all will automatically do so.

Para 5.4: It would be helpful to add a sentence that makes it clear that many small scale developments will only generate a limited amount of traffic movements at times outside of peak hours and that this should not be considered as a material objection. This is important as often extra traffic movements are cited as a reason for refusal when, in fact, the proportion of extra traffic is minimal in comparison to existing high levels of commuter and local traffic movement.

Para 5.8: good design to accommodate visits by people with disabilities is an important consideration and would be better dealt with as a separate paragraph to emphasise its importance.

Chapter 6

Para 6.2: Developers should also provide information on the anticipated volume of visitors in an initial discussion to demonstrate their understanding of the scale of the operation. Additionally, in the case of large developments it is helpful for developers to have carried out an environmental impact study to measure the potential effects, including benefits, on the environment.

Para 6.3: It would be useful to say that early indications on the design and use of local materials in construction are helpful in speeding the planning process.

Para 6.8: The reference to supplementary planning documents is relevant to a number of issues over and above “Design Guidance” and may be better set out as a separate section in this Chapter. Alternatively the existing section could be re-titled.

Para 6.9: In the rural context it would be helpful to include reference to landscape character assessments where they exist to create a clear picture of the nature of the area and the type of landscaping and overall design that would be acceptable.

Para 6.11: It might be helpful to add a sentence here about the building control regulations concerning provision for people with disabilities.

Para 6.12: Conditions should not be imposed that significantly affect the economic viability of a development. A balance needs to be struck between conditions and the profitable operation of the businesses. This should be referred to in this paragraph.

Annex A

Para 4: I am not sure the example given here about walkers is helpful. Clearly any visitor seeking that kind of experience will choose an establishment close to their preferred activity and owners will market according to their locational strengths. Is a poor understanding of which markets to appeal to a material planning consideration? The planning process should identify the appropriate type, scale and design of developments but should not seek to instruct the private sector in which markets to appeal to. This will only be relevant if the development is specifically designed for a particular market and is in the wrong place e.g. a

camping barn in the middle of town, but this seems so obvious it may not be worth mentioning.

Para 4 addition: There should be a comment here on the need for hotel staff accommodation. In order to both attract and retain employees, the need for hotel staff accommodation should be recognised, and planning applications for such developments sympathetically received.

Para 26: It would be useful to identify what “other” forms of self-catering provision are being referred to – I assume its rural cottages, barn and stable conversions, hostels, camping barns etc. but it would help to list examples.

Annex B

Para 1: I think it would be helpful to rephrase the fourth sentence to read “The spread of demand extends the use of accommodation through shoulder and off peak periods, thus enabling providers to improve their year round income and occupancy levels (providing a possible alternative to physical expansion) as well as sustaining the economic benefits for the local community”.

Para 2: The duplication of ‘use’ needs to be removed from the last sentence of this paragraph.

Para 3: Emphasise that the control of the consented operation of self-catering accommodation is best achieved with relevant conditions that are reasonable and enforceable and should avoid conditions that place undue and potentially onerous restrictions on the site owner/operator.

Annex C

The point made under Chapter 4 Paragraph 11 refers here.

TOURISM SOUTH EAST

TSE is the principal agency in the region with strategic responsibility for the development and management of tourism. Income is via a combination of public subsidy (via the South East England Development Agency) and private sector funds (via membership subscriptions and selling training packages, for example). Annual turnover is £7million. Our area covers nine counties and matches SEEDA's boundaries.