

TOURISM SOUTH EAST

Sector specific paragraphs for Local Development Frameworks

from

Tourism South East

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1 Strategic objectives

One of the seven priorities identified for the South East Region in RPG9 (Nov 2004)¹ is to support tourism and recreation. Tourism provides a very significant part of the region's economy, currently generating £10 billion of spending (equivalent to 7% of regional GDP) and supports an estimated 225,000 jobs. Tourism South East (TSE) wish to see the Local Development Framework (LDF) reflect the importance of this growth industry with the inclusion of planning policies that support appropriate sustainable growth of the tourism sector in the area.

TSE strongly supports the Good Practice Guide (GPG) on Planning for Tourism (May 2006)², and acted as a consultee in its production. The GPG sets a national framework for planning that stresses the importance of tourism as a key economic development activity.

TSE also strongly supports SEERA's South East Regional Plan and is associated with local and regional planning bodies in the implementation of the Regional Plan. ***TSE has been a core consultee in the production of this regional guidance*** in order to reflect the significance of tourism to the region and to ensure that policy seeks to promote tourism as a key economic development activity within the Region.

Within the framework set by the overall vision and objectives of the Regional Spatial Strategy for Tourism there is a clear emphasis on supporting and promoting tourism. It is axiomatic therefore that the role of policy at the local level should positively reflect this by encouraging suitable improvements in the quality and range of tourism products.

2 The importance of tourism to the regional and local economy

TSE would emphasise the important role tourism plays in providing employment and the wider contribution tourism makes to the local economy. As a matter of planning policy principle, the Council is urged to reflect the economic importance of tourism (and the desirability and benefit of promoting tourism growth and development within the Authority's area) as a guiding principle in the LDF.

It is TSE's belief that Tourism should explicitly feature within the LDF's Core Strategy.

3 Environment policy and tourism development in the countryside

LDF policy seeks to protect the countryside for its own sake in accordance with national planning policy guidance and for special emphasis to be placed on preserving the natural beauty of areas of outstanding natural beauty and special landscape areas. In achieving this important objective, policy can impose such a degree of control over new development that there is, in effect, a development embargo in place. Policy should

¹ TSE acted as a core consultee for RPG9, which will act as official guidance to local authorities until the South East Plan is formally adopted in the next two or three years.

² Good Practice Guide on Planning for Tourism, *Department for Communities and Local Government (formerly Office of the Deputy Prime Minister)*, May 2006.

reflect the needs of the local economy, including the important part tourism can play in this, while retaining sympathy for the countryside. Where applications for tourism development are put forward, policy should seek a balanced view between the need to protect the environment and the benefits that the tourism initiatives may bring to the area; even if this benefit is likely to be only modest in terms of income generation for stakeholders and to local employment. Countryside development policies need to provide an element of flexibility to allow for high quality, sensitively designed new development where this can be achieved without harm to the countryside and to other matters of recognised importance, and where evidence justifies such development.

4 Attractions

As a guiding principle, TSE considers that priority should be given to improving the quality of existing attractions so they can meet changing consumer demands and provide high environmental standards in terms of design and access. This approach is supported by regional planning policy in The South East Plan.

TSE wishes to see adequate provision for new, regionally significant tourism attractions to be developed where they will expand the region's tourism product and market share, they can be accessible for people with disabilities and can be reached by public transport.

5 Accommodation

TSE considers that high quality accommodation is an essential component for the overall improvement of the regional and local tourism product. Retaining and developing a high quality tourism base is considered to be an essential element of this strategy and will be vital to attract longer stay visitors who spend more, resulting in greater benefits to the local economy.

TSE has produced guidance documents for local authorities on a number of accommodation sector issues:

Attracting hotel investment

- www.industry.visitsoutheastengland.com/developing/product/hotels.aspx

Retaining tourist accommodation

- www.industry.visitsoutheastengland.com/developing/product/hotels.aspx

Rural pub accommodation

- www.industry.visitsoutheastengland.com/developing/product/ruralpubs.aspx

B&B accommodation

- www.industry.visitsoutheastengland.com/developing/product/BandB.aspx

5.1 Protecting existing accommodation

TSE supports the protection of existing visitor accommodation, particularly where there is considerable pressure for the loss of these to other uses, and there is clear evidence of demand. TSE is concerned that accommodation could be lost where individual owners/operators deliberately over-price accommodation, under-market it, or allow the facility to become run-down and neglected through under-investment and poor management. Experience shows that this is often a pre-cursor to applications being made for changes of use or redevelopment, based on 'poor performance', 'lack of demand' and unsuitability for continued use. Councils therefore need to be explicit in addressing this issue through LDF policy where there are evidenced levels of demand.

Planning policy needs a requirement by which the Council has to have sufficient evidence in the form of a marketing report covering a consistent period of 1 year minimum, for example, to show that the property was marketed at a competitive and realistic price and marketed through appropriate media and mainstream tourism publications at the local, regional and national level. Evidence of a clear and demonstrable lack of demand for the facility should be provided, and that a lack of demand is based on evidence of the preceding 3 years occupancy rates and trading figures and any other relevant factors such as previous marketing or business plans.

It may be appropriate to develop Supplementary Planning Guidance (SPG) to demonstrate how to translate policy into action, clearly specifying the criteria and support documentation required for submission with any Change of Use application.

TSE recognises that not all existing visitor accommodation will or should be retained in that use and that some facilities will be lost to other uses, particularly if the quality of the existing facility is of poor standards and quality. However, it is important that the Local Plan/LDF adopts a positive and structured approach to retaining existing accommodation where evidence of demand exists.

5.2 Provision of new accommodation in rural areas

Where significant tourism potential exists in small rural towns, the local authority should identify actions to strengthen links between these towns and their hinterlands through improved and integrated sustainable transport links, complementary product development and investment.

TSE encourages the Council to take a positive stance towards the provision of new visitor accommodation in the form of conversions of a wider range of existing (rural) buildings; appropriate extensions of existing accommodation; appropriate additions to accommodation (as a separate but related facility); and entirely new provision where this is supportable and appropriate. This may entail policy adopting a more 'open' view of tourism accommodation, and providing opportunities for new high quality facilities where these can be achieved without harmful impacts.

Research undertaken by TSE illustrates that a significant number of rural self-catering units do not occupy buildings of 'architectural merit', but still have market appeal where high standards of design have been adhered to in the conversion process. As a general rule, TSE advocates that all rural tourism developments should be of appropriate scale and design, as to be congruent with their surroundings using local materials and labour.

TSE suggests that policy can be more positive whilst providing the appropriate degree of protection for these areas. Proposals for conversion of buildings for visitor accommodation should be allowed a) where the proposal would assist in the diversification of the rural economy; b) secure the future of a listed building or another building of architectural merit; or c) facilitate the survival of the farm business.

PPG2 supports the re-use of buildings in the Green Belt with suitable safeguards, to ensure they should not prejudice the openness of the Green Belts. PPG2 does not require that the re-use of buildings within the Green Belt should only be considered where they are listed, of architectural merit, or 'worthy' of retention. Indeed, paragraph 3.9 points out that if a planning application is submitted for the re-use of an existing building which the local planning authority considers has a significant adverse effect on the landscape in terms of visual amenity, it may be appropriate in connection with the proposed structural changes to impose conditions to secure an improvement in the external appearance of the building.

5.3 New hotels

TSE supports the provision of a range of hotels, which bring about economic and employment benefits for the area, and make a positive contribution to urban and rural regeneration. The development of additional three/four star business hotels is a particular priority for investment within the Region. Policy should not be excessively prescriptive by restricting hotel development to specific (allocated) locations or zones unless product development research and developer interest have been completed alongside a demand assessment, resulting in site identification³. Such a restrictive policy would thus prevent the proper evaluation of proposals for other sites against legitimate criteria within the Local Plan/LDF. Should evidenced sites be included in the LDF, development pressure from other uses for those sites should be resisted, particularly office, residential, retail uses with which hotel values cannot compete.

TSE suggests that a flexible approach is adopted which would encourage the location of new hotel development at specified locations, but would also permit hotel development at alternative sites to be assessed against relevant planning criteria contained within the Local Plan/LDF. The setting of such criteria would ensure that possible impacts in terms of traffic, visual impact and effect on the environment would be fully addressed.

TSE wishes to encourage the upgrading and extension of existing accommodation stock to meet consumer demand where there is evidence to support this. We also strongly encourage the Council to support the provision of affordable staff accommodation as part of new and existing stock, especially in areas of housing pressure.

Planning policy should allow consideration for the general principle of use (or extension of uses) such as pubs and golf courses in rural areas, where such accommodation would secure the viability of that use and where new hotel development might not be viable on its own.

³ TSE continues to work in partnership with Local Authorities to assess the potential for future hotel development opportunities, developing a database for suitable, deliverable sites.

Sequential testing should not be applied to hotel development schemes, and whilst development in town centres may be favoured, there should be sufficient flexibility for planning departments to respond to the needs of different hotel products and their markets.

5.4 New 'serviced' accommodation

The term 'serviced accommodation' applies to a wide range of different accommodation ranging from large hotels, through to inn accommodation and bed and breakfasts of less than six bed spaces. As different tourism markets exhibit a preference for specific types of accommodation, it is important that the Council attempts to foster a range of different types of serviced accommodation.

The further development of bed and breakfast accommodation in the rural parts of the area may be therefore as important as the development of business-orientated hotels when developing strategies to maximise the future role of tourism within the local economy.

5.5 'Non serviced' accommodation

Current TSE tourism strategy identifies the development of rural self-catering units across the region as a strategic priority. Recent research by TSE has established that the South East has considerably less self-catering units than other regions across the UK, to the extent that in some areas, demand considerably outstrips supply. Self-catering accommodation is considered to have particular growth potential, as it has direct appeal to an increased number of UK residents wishing to take additional holidays outside their main holiday abroad.

Rural self-catering is particularly beneficial to the local economy due to the longer average length of stay compared to serviced accommodation, which results in higher than average levels of overall expenditure per trip. TSE therefore sees the encouragement of such rural visitor accommodation and the protection of future and existing stock as an essential input to the Local Plan/LDF tourism strategy and policies.

Particular support should be made to the upgrading and enhancement of existing non-serviced accommodation where this will not have a detrimental impact on the surrounding natural environment.

5.6 Static caravan sites

TSE considers that planning policy should allow a degree of flexibility if appropriate new sites or alternative sites are put forward. Whilst it is recognised that new static caravan sites will need to be located with a great deal of sensitivity, policy should not place an embargo on such provision in the future. Small-scale static caravan sites may be a beneficial diversification for an existing tourism operator, where high quality accommodation at the lower end of the market can add vital economic support for that enterprise. Furthermore, The South East Plan is explicit in facilitating the upgrading and enhancement of existing un-serviced accommodation where this will not harm landscape quality or environmental assets. The Plan requires particular attention to be made to identifying suitable alternative sites for the relocation of holiday parks that are under threat from coastal erosion or flooding.

In appropriate locations where applications are made to extend sites, or create new sites, consideration should be given to reserving one third of the pitches for touring caravans and campers.

5.7 Caravan and camping sites

TSE welcomes initiatives that enhance the standards of existing site facilities and the environmental quality of sites. Where an application is made to extend an existing site, or for a new site, there should be high standards of amenities provided, adequate safe access to a public highway and a high standard of layout and landscaping. Policy should avoid restricting the use of sites beyond four weeks in any calendar year to allow operators to meet seasonal demand and to be able to offer off-peak packages to maintain tourism income over a wider part of the year.

5.8 Occupancy controls

Regional Planning Policy in the South East Plan advocates the reduction of 'seasonality' for coastal tourism development. TSE considers that this issue needs to be addressed in other areas too where over-stringent and unnecessary controls over the period of occupation, length of occupation and returns may severely test and limit the economic viability of enterprises. It is considered that the Local Plan/LDF should promote policies to allow operators flexibility to open throughout the year. Where self-catering accommodation is involved, it is acknowledged that there may be a fine line between a genuine use for tourism and residential use. However, control of the consented activity is best achieved with relevant conditions that are reasonable and enforceable and avoid conditions that place undue and potentially onerous restrictions on the site owner/operator.

Many areas in the wider tourism market now rely on seasonal breaks including those during the winter. Conditions preventing occupancy between October and March (often used by planning authorities in the past) are out-dated and do not reflect current trends in the tourism industry. In TSE's experience, a condition to restrict opening for one month of the year (the specific month would be subject to discussion and agreement with the operator, but would usually be January or February) is an appropriate and enforceable way forward.

5.9 Mixed-use of visitor & homeless accommodation

TSE believes that where visitor and homeless accommodation is combined within a single property there is a resulting detrimental effect on quality standards and a negative impact on the visitor experience. This is reflected in the code of conduct for participation in the National Quality Assurance Standards which states; *"It is unlikely that any establishment offering accommodation to DSS residents or operating as a refuge hostel for homeless people will be eligible to participate in the scheme."*

Planning authorities are therefore urged to resist granting planning permission for this type of mixed use and should, where possible, create policies that seek to discourage developments of this type. Further to this, TSE would wish to see planning permissions include a condition to ensure that the use is for tourist accommodation only.

6 Coastal towns

As priority areas for tourism regeneration, Councils in coastal towns needing such policy should seek to control the gradual reduction of bed-stock and encourage conversion of non-viable or outdated stock for complementary tourism uses such as holiday apartments.

To reflect the objectives of regional planning guidance, the Local Plan/LDF should promote opportunities to diversify the economic base of the region's coastal resorts, whilst consolidating and upgrading tourism facilities in ways that promote higher value activity, reduce seasonality and support urban regeneration. The South East Regional Plan is also explicit that local authorities should act strategically in collaboration with the regional tourist board, to develop complementary approaches to the marketing and development of coastal resorts to enhance their overall competitiveness.

7 Transport and access

TSE recognises that the private car will remain the primary mode of transport for most visitors for the foreseeable future, particularly in terms of access to villages, attractions and accommodation that are poorly served by public transport or have no convenient public transport links at all. However, TSE encourages an integrated approach to transport systems and transport planning, to maximise opportunities for walking, cycling and public passenger transport.

TSE encourages greater accessibility to tourism facilities and services, both from a disability as well as a social inclusion perspective. TSE also encourages tourism providers to ensure the principles of inclusive design are adopted wherever possible and practicable. It is important that policy allows for good quality facilities which can be available to disabled people, including accommodation and the facilities provided at attractions and in accommodation. Equally, it is often the case that attractions and accommodation will only be in reach of disabled people who have cars. TSE encourages more public transport to be made accessible to disabled people.

8 Inland waterways

To reflect the aims of regional guidance, the Local Plan/LDF should promote policies that protect access to and support proposals for upgrading inland waterways and associated facilities for recreational use in accordance with appropriate management plans and strategies.

9 Water-based recreation

The Local Plan/LDF should encourage water-based recreation (unless there is a clear nature conservation conflict) on the basis that they do not conflict with other recreational uses or would harm residential or other amenity or the overall character of the area.

10 Conference facilities

The conference market plays an important economic role in many of the region's coastal towns and cities, as well as at a range of inland locations. Recognition needs to be given in planning policy to the potential business and economic benefits that this use can bring to an area and provision should be made for new and improved facilities where there is an identified deficit. A range of types of facility can be catered for in different locations, for small or large delegation sizes and with a variety of associated facilities. Conference facilities may be most appropriate as part of an existing hotel complex whether in an urban or rural location and where there is adequate means of access and where local amenity will not be harmed.

11 Sporting facilities

The Local Plan / LDF should make adequate provision for new or existing significant regional sporting venues to redevelop or expand in order to meet future needs.