Planning for leisure and tourism: main document
On 5th May 2006 the responsibilities of the Office of the Deputy Prime Minister (ODPM) transferred to the Department for
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Summary
A research report on how planning policy guidance for England can best facilitate leisure and tourism developments whilst achieving more sustainable patterns of development and travel.

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The findings and recommendations in this report are those of the consultant authors and do not necessarily represent the views or proposed policies of Communities and Local Government.

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The research was commissioned in 1998 as part of the DETR Planning Research Programme. The views expressed in this report are those of the consultants and do not necessarily represent those of the Department.

The research and writing of the report were completed by mid-2000. Some additional editing work has been undertaken since then, but it has not been possible to reflect all the policy developments that have occurred in the interim, notably the publication of the final version of PPG11 in October 2000.
Executive Summary

Introduction

Background

S1 Leisure and tourism development is a major pressure for land-use change and the planning system must ensure that such developments are located in accordance with the overall principles of sustainable development that underlie the Government's Planning Policy Guidance. In April 1998, DETR commissioned this two-stage research project into how planning policy guidance for England could best facilitate leisure and tourism developments whilst achieving more sustainable patterns of development and travel.

Methodology

S2 The study was divided into two stages. Stage One considered Planning for Leisure and Stage Two considered Planning for Tourism. Underpinning these two stages was an examination of the key drivers for change in leisure and tourism activity (social and economic trends, trends in leisure and tourism property development, trends in related Government policy) and a consideration of some of the impacts of leisure and tourism development.

S3 Similar research was carried out for each of the two stages of the project. This involved literature reviews, extensive consultation, surveys of all local planning authorities (LPAs) in England, surveys of a sample of private sector investors, developers and operators and desk research into a sample of development plans and planning appeal decisions relating to each land use in turn. The LPA surveys considered how leisure and tourism had been dealt with in plan-making and development control, focusing on whether plans and decisions are reflecting Government planning policy relating to each sector/use. From this background work, a series of issues was identified and relevant case studies were then analysed.

The case studies for Stage One (leisure) focus on:

- planning processes in Norwich, Bicester, Wakefield and Kettering;
- planning impacts in Barking and Bristol; and
- A3/small leisure developments in Ealing and Sheffield.

The case studies for Stage Two (tourism) focus on:

- regional tourism planning in the North West;
- new approaches to tourism planning and visitor management in Cambridge;
- the nature and impact of budget hotels in Cornwall;
• a positive approach to planning for caravans in Great Yarmouth; and
• the development of a non-footloose attraction at Fountains Abbey.

Background findings

The report concludes that planners need to understand the sectors distinctive features and be aware of the trends and their implications given the potential for rapid change and likely sustained future growth in leisure and tourism. It also concludes that planning policy needs to reflect the special circumstances related to the impacts of leisure and tourism ie that:

• leisure and tourism developments are major contributors to GDP and can act as catalysts in local economies;
• travel for leisure and tourism generates a significant number of trips, predominantly by car, but this is ameliorated by the relatively high occupancy of cars and the off-peak nature of trips;
• the environmental and community impacts caused by leisure and tourism development are complex, including the vitality and viability of town centres, public amenity, the beneficial use of historic buildings and potential intrusion into rural, often sensitive areas.

Planning policy is just one of a diverse range of potential policy responses to these potential impacts; others include licensing and visitor management.

Key findings, conclusions and recommendations

Leisure and PPG6

There is a general acceptance, by both the public and private sectors, of the objectives behind PPG6 and 13 and the plan-led process. However, there is evidence of inconsistent decision-making and uncertainty related to:

• the relative importance of local economic development objectives;
• the definition and means of assessing need and capacity;
• the application of PPG6 to large and/or mixed-use leisure developments;
• the need to provide access by different transport modes and the application of maximum parking standards;
• the definition and measurement of the vitality and viability of town centres in leisure terms; and
• the application of PPG6 to different leisure land-uses.
S6 Economic development has been used in a number of planning applications and appeal cases to justify out-of-centre leisure development (cf Wakefield, Kettering, Bristol and Dagenham case studies). Economic development is of course a material consideration which can be taken into account in making planning decisions; but giving it over-riding priority does not accord with national policy. **There is a need to clarify the role of local economic development objectives, alongside the other PPG6 issues of vitality and viability, trip generation and accessibility, within national planning policy guidance.**

S7 Current policy states that the requirement to demonstrate need should not be regarded as being fulfilled simply by showing that there is capacity (in physical terms) or demand (in terms of available expenditure within the proposals catchment area) for the proposed development. This infers that other factors may form part of the demonstration of need. In some appeal cases, the concept of need has been considered to include employment creation as well as other benefits to a community. The research generally found considerable uncertainty concerning the definition and assessment of need. **Clarification is needed as to what other factors the definition of need should cover in addition to market capacity and physical capacity eg the effects on local leisure provision.**

S8 There are problems with capacity assessments, particularly in a rapidly changing market. Nevertheless, common methodologies for capacity, need and related impact assessments need to be agreed nationally for different land-uses. **This requires further detailed, co-ordinated research to establish the optimal means of assessment.**

S9 Small leisure facilities such as pubs and restaurants contribute to the vitality and viability of town centres. **Leisure development of all scales should be directed towards an appropriate town or district centre in line with the principles of PPG6 and PPG13.**

S10 Large sites may not be available in town centres for the scale of development (often including several uses and parking) that developers are now seeking. Large out-of-centre proposals are sometimes justified on the basis of a relationship between the particular leisure uses which requires them to be located together. The case for functional synergies is questionable but there may be circumstances that could help justify a large development eg to allow for the cross-subsidy of a desirable but non-commercial element. **Current policy relating to disaggregation of uses should be reinforced as a key principle of PPG6. Large leisure proposals (over 1,000m²) should be required to prepare an impact statement including, where necessary, the economic justification for the inclusion of cross-subsidising elements of the development.**

S11 One of the key constraints on town centre leisure development is the lack of parking in town centres. The research indicates that unless public transport in the evening is effective, it is unlikely that leisure development will go forward in town centres without adequate car parking. Town centre leisure developments with adequate parking provision will still contribute to vital and viable town centres and, if the public transport is reasonable, meet the needs of those without a car, although they may not contribute to the reduction of private vehicle trips. **It is important to provide adequate town centre parking to meet the needs for evening (leisure) use and to promote shared parking between uses operating at different times**
Assessment of the vitality and viability of town centres is complex but assessments of impact have been partial or non-existent. The research revealed few attempts to assess trade diversion, impact on future investment or loss of diversity arising from out-of-town leisure development or consider the opportunity cost for town centres. New approaches, underpinned by research, should be developed to measuring the long-term impact of out of centre leisure developments on the vitality and viability of town centres.

The sequential test offers a rational, effective, general approach to planning for leisure. However, there are certain aspects that require clarification. The key constraint identified by both the private and public sectors with respect to major leisure development was the lack of suitable sites, particularly in town centres. LPAs should be encouraged to identify and/or assemble leisure development sites to meet identified need. There are several other points related to the sequential approach that require clarification, including criteria for defining the location and availability of sites. The definition of town centre, edge-of-centre etc locations should be undertaken at the development plan stage. Developers should be required to demonstrate that they have used the sequential test when submitting planning applications.

The sequential approach is not always applied to some leisure land-uses eg traditional public sector leisure facilities, restaurants and bars. There do not appear to be any over-riding reasons to distinguish between different leisure land-uses in terms of locational policy. All leisure development should be directed towards an appropriate town or district centre in line with the principles of PPG6 and PPG13.

The surveys revealed support from both public and private sectors for a new PPG on leisure uses or a separate section within a revised PPG including leisure. PPG6 should be revised to provide up-to-date focused advice on planning for leisure clarifying rather than changing the policy itself.

Regional/(sub)regional planning for leisure

Regional Planning Guidance (RPG) currently contributes little to planning for leisure. RPG should make specific reference to the (sub)regional planning requirements for major leisure development. LPAs, planning bodies and the private sector should co-ordinate and prepare background research and capacity studies where appropriate.

Leisure and development plans

PPG6 advises LPAs to undertake background research, consult with the industry and to identify sites for leisure as well as other town centre uses. Few LPAs in the survey followed this advice. Overall, leisure is not given the profile in development plans which the industry believes is justified. Norwichs exemplary process has resulted in meeting its leisure planning objectives and in Ealing, the pro-active approach towards A3 amenity problems appears to have reaped planning benefits. LPAs should work pro-actively in planning for leisure development. The benefits of such action should be reinforced in guidance.
S18 Few development plan policies are specific to leisure and if they are, they usually relate to public sector facilities. LPAs are adopting *general* policies to promote development in urban areas and, in most cases, it is implicit that the policy applies to leisure. **Leisure needs more comprehensive, specific and detailed consideration in development plans, taking account of the policies set out in PPG6 and PPG13.**

S19 The availability of sites, notably in town centres, is the crucial issue for both the public and private sectors. Although a majority of LPAs has allocated sites for mixed-use including leisure, far fewer refer specifically to leisure sites. **In the light of PPG6, PPG13 and needs/capacity assessments, available, suitable and viable sites need to be allocated for the (different types of) leisure development proposed.**

S20 Supplementary Planning Guidance (SPG) can be particularly helpful in marshalling information on local issues, objectives, policy and advice on discrete leisure themes such as A3 development. **SPG should be used to provide a degree of flexibility in relation to the development plan.**

S21 There is an apparent misunderstanding of the purpose of maximum parking standards. For example, there remains a tendency to view the standards not as maximum permitted levels of parking but as absolute requirements. **National parking policy needs to be applied correctly and consistently by all LPAs to leisure developments.**

*Leisure and development control*

S22 Although PPG6 and PPG13 issues were seen as important, in several cases, LPAs differed from inspectors in the weight they gave to them. These different weightings reinforce the need for clarification of planning guidance.

S23 Relatively little background research has been undertaken by LPAs in respect of applications for leisure development. Equally, few applicants submit background studies eg assessments of the impact of proposals on the vitality and viability of town centres. There is no common approach as to the evidence appropriate and necessary to support major leisure planning applications. This is largely to do with the absence of commonly accepted methodologies for leisure impact assessments. **In situations where leisure applications do not accord with the development plan, LPAs should require an appropriate leisure impact assessment to include an assessment of local capacity, transport and environmental impact (including vitality and viability of the town centre).**

*A3 development and the Use Classes Order*

S24 LPAs are probably experiencing more problems with A3 development than with the relatively smaller numbers of major leisure developments (eg Ealing case study). Public amenity can be seriously affected by pub and night-club development. In other areas, urban LPAs can experience difficulties in promoting A3/D2 development eg with licensing regimes, when seeking to develop the evening economy within town centres (eg Sheffield case study).

S25 The case studies suggest that a fine-grained, multi-disciplinary approach is needed to control, promote and manage small-scale leisure developments such as A3 and night-club
uses. Partnerships and area management have been key to the success of the initiatives in Sheffield and in Ealing, helping to meet defined planning objectives. This type of approach represents an example of pro-active planning as proposed in PPG6. It is complex and has resource implications but it is needed to resolve equally complex planning issues.

S26 Important issues remain in the relationship of planning permission and licensing. Co-ordination, simplification and clarification of licensing procedures would appear to be a priority. Co-operation between planning and licensing authorities is crucial for the effective planning and management of A3/D2 land-uses. It is recommended that LPAs take a pro-active lead and co-ordinate relevant partnerships to consider the future management and development control of A3/D2 issues. This should apply equally to areas seeking to restrain and to promote A3 development. LPAs should consider marshalling their planning policies for A3/D2 uses within dedicated Supplementary Planning Guidance. It is further recommended that the Use Classes Order (A3) is changed on the basis of the proposals made by the National Planning Forum.

Tourism and PPG21

S27 National planning policy for tourism (PPG21) pre-dates PPG13 and is very different in style to PPG6. Tourism is now promoted in national policy as an essential activity, contributing economically and socially to the quality of life, notably in rural areas. Planning for tourism needs to be considered in the context of the sustainable development issues inherent in later guidance. PPG21 should be brought up to date and reflect the special nature of tourism land-uses and sustainable development principles.

S28 Most individual tourism land-use developments have a relatively low environmental impact but the cumulative impact needs careful planning, particularly in sensitive areas, placing more importance on capacity analyses for tourism development planning. In terms of accessibility, the number of non footloose tourism facilities in rural areas is a distinctive feature of the sector. In areas of environmental sensitivity, particularly where there is a concern about the cumulative impact of tourism development, planning policy should be framed in the context of an appropriate capacity assessment. Major travel generators should be concentrated in town and other centres well served by public transport but there should be flexibility for those tourist facilities whose location is not footloose.

Different tourism land-uses

S29 The research identified a number of features relevant to the planning of individual tourism land-uses; hotels, caravan sites and attractions. The different land-uses have different impacts with specific location and access requirements.

S30 National policy currently encourages hotels to be located within existing settlements and at locations accessible by alternative means of transport. Where this is not an option, the special features of small, budget hotels suggest that flexibility in location may be justified in order to meet other objectives. Large hotels should be treated as town centre uses and subject to PPG6 principles. Major conference facilities and independent restaurants that are not ancillary to the hotel use should be considered separately. LPAs should be encouraged to identify and/or assemble hotel development sites in the context of
identified need. Small hotels need to be treated more flexibly although they should be encouraged to find sites in town and district centres or, at least, built-up areas.

S31 Caravans are often seen as environmentally intrusive as most are, and need to be, located in a rural, attractive environment. Many caravan operators are keen to enhance their sites but need to expand to facilitate this. PPG21 encourages such improvements but the industry reports that this policy is not being implemented universally. **A stronger endorsement of the current principles in PPG21, Annex B is justified.**

S32 In terms of attractions, the important distinction for planning purposes is between footloose facilities and those that are not footloose e.g. heritage sites. Many of the latter are in rural locations. Although most individual attractions do not attract large numbers of trips, when they are in rural areas, alternative means of transport are often lacking. The proportion of car usage to rural attractions like Fountains Abbey is high. It is proving difficult, however, to effect modal change. **Large attractions are relatively rare and should be treated on their individual merits; there is no need for national criteria specifically for large tourism facilities. Footloose attractions that contribute to the vitality and viability of town centres should be subject to the principles of PPG6 and the sequential test. Non footloose, small rural attractions would best be dealt with in the context of a visitor management study and overall capacity analyses.**

**Regional/(sub)regional planning for tourism**

S33 As with leisure, RPG currently does not reflect the acknowledged importance of the tourism industry and has fallen short in terms of addressing tourism issues of regional planning concern (eg NW Region case study). Current draft guidance suggests RPG could offer significant benefits to tourism planning.

S34 RPG might add real value by undertaking an independent review of a tourism sub-region assessing current tourism impacts, future environmental capacity and economic need for further tourism development (including farm diversification) in a land-use planning context. In tourism terms, capacity analyses at a (sub)regional level are very important, particularly in rural, environmentally sensitive areas where it is important to gain an objective assessment of current pressures and need for different forms of development in different areas eg hotels, caravans and attractions.

S35 There is a very important co-ordination role needed between the LPAs, RPBs, RDAs and RTBs in undertaking these capacity studies and identifying other planning issues. There are resource implications in the additional research, analysis and monitoring. **PPG11 (see endnote) should specifically refer to the need for RPG to include tourism and advise that planning bodies should co-operate at a (sub)regional level to identify both need and capacity for tourism development.**

**Tourism and development plans**

S36 Tourism featured more prominently than leisure in the reviewed development plans. The purpose of most tourism policies is to protect environmental areas rather than to reflect the broader principles of sustainable development inherent in PPG6 or PPG13. **LPAs need to**
reflect the underlying principles of any revised PPG21, PPG13 and PPG6 in their policies for tourism.

S37 The fragmented nature of tourism has led to a fragmented policy response in statutory plans and other documents. Many LPAs prepare tourism strategies but most are marketing oriented. Development plans are the appropriate vehicle for tourism development control policy but good visitor management plans including relevant planning policies can, in many cases, be helpful. Visitor management in its widest sense is crucial to ameliorate the perceived impacts of the development of tourism destinations. Land-use planning and control is part of this multi-functional process. In some major destinations, like Cambridge, the different parties involved in tourism have been successfully drawn together to provide an effective forum for the consideration of planning issues. LPAs are well equipped to provide a co-ordinating role. **Planning for tourism is not simply concerned with the control of new tourism land-uses but must involve the control of all land-uses and activities including tourism - that go to make a tourism destination. It should also focus on broader destination visitor management, controlling the diversity of activities that generate trips and cause congestion. Local authorities should co-operate with, and facilitate, appropriate partnership groups for effective tourism planning and visitor management to complement planning policies.**

S38 This research has outlined the contribution that tourism can make to rural regeneration. **There is a need for LPAs, in partnership with others, to assess systematically the impact of tourism in their (sub)region (particularly in the countryside), review potential capacity for different types of tourism development and develop policy appropriate to the local area(s).**

S39 Although many LPAs have allocated sites comprising or including tourism uses, these are often for unspecified tourist uses or mixed-use sites. **In the light of PPG6, PPG13 and needs/capacity assessments, available, suitable and viable sites need to be allocated for proposed tourism developments with relevant criteria made explicit.**

*Tourism and development control*

S40 Relatively little background research has been undertaken by LPAs into the impacts of tourism uses and few applicants submit background studies. The most frequently mentioned issue for LPAs relating to major developments is the effect on open countryside and designated areas in particular. Highways and traffic were also major issues but others relating to the location of developments, their accessibility, their impact on town centres and other considerations in PPG6 and PPG13 were raised less frequently. LPAs consider economic development an important issue in tourism development, even within sensitive areas. The review of applications and appeals shows that LPAs often fail to apply PPG21 and PPG13 (and PPG6) issues to tourism uses. However, the appeal decisions reviewed indicate a significant degree of flexibility and/or ambiguity in interpretation, particularly in relation to trip generation and tourism need. **It is recommended that applications for new attractions and large hotels be considered in the context of PPG6 and PPG13 considering in particular; location, trip generation, accessibility, impact upon the town centre and economic development.**
The role of the private sector

S41 There was much criticism of LPAs by the leisure and tourism private sectors, principally their lack of knowledge of the industries and the low status accorded to such developments. However, the private sector acknowledged that they offered little to the plan making process. If the planning process is to gain full support, it is important that the private sector become involved in a pro-active way.

S42 The private sector has a particular contribution to make in terms of:

- participation in, and contribution towards, further research at national and local levels eg techniques for capacity assessment;
- participation in local plan making and visitor/town centre management through local partnerships; and
- raising awareness of sustainable development issues within the industry.

S43 Recognised trade organisations, including the Regional Tourist Boards (as public-private sector bodies), have a potentially very important role to play in respect of plan making, further research and dissemination of information within the sector. The private sector should recognise that for its concerns to be met and policy to be improved, it should be actively involved in the formulation of RPG, the preparation of (sub)regional capacity studies and development plans, the identification of development sites and the preparation and implementation of management plans for town centres and other tourism pressure points.

Endnotes
1. This research was finalised before publication of PPG11 (Regional Planning) in October 2000.
1. Background To The Study

Introduction

1.1 Leisure development is a major pressure for land-use change and the planning system must ensure that leisure developments are located in accordance with the overarching Government objectives, of promoting urban renaissance, greater social inclusion and more sustainable patterns of development, that underlie Planning Policy Guidance.

1.2 In April 1998, DETR commissioned this two stage research project into how planning policy guidance for England could best facilitate leisure and tourism developments whilst achieving more sustainable patterns of development and travel. Stage One covers leisure and Stage Two covers tourism. (see Appendix I: Project specification).

The brief

1.3 The objectives for the two stages of the research were similar:

- to identify the current trends in leisure and tourism developments;
- to consider the locational and other land-use and transport requirements of the English leisure and tourism industries;
- to ascertain how effectively the planning system is dealing with these at present, including the contribution of planning policy guidance; and
- to recommend how planning guidance could be developed or revised to ensure provision is made for leisure and tourism development which takes full account of sustainable development principles.

1.4 The brief suggested that the scope of the work would be defined by a number of issues including:

- identifying the range of leisure activities;
- the aspirations and needs of leisure and tourism developers;
- assessing how leisure and tourism issues are dealt with by local planning authorities (LPAs);
- assessing the positive and negative impacts of new developments; and
- judging how well recurring issues are resolved through the planning process.
1.5 This report investigates these issues and seeks to provide findings and conclusions on general planning principles for the main types of leisure and tourism use including:

- how LPAs can plan positively for leisure provision; and
- how leisure developers can best meet the objectives and purposes of planning policy guidance.

**Methodology**

1.6 The work programme has involved:

- desk research on leisure activities, products and leisure property trends;
- a definition and classification of leisure and tourism land-uses;
- a legislation and policy review;
- the identification and agreement, in turn, of leisure and tourism planning issues;
- consultations including postal questionnaire surveys that went out for both stages to LPAs in England and a sample of private sector developers and operators; and
- a series of case studies addressing the identified issues.

**Definitions of leisure and tourism for this project**

1.7 Leisure is usually perceived to mean entertainment (in and out-of-home) including most attractions, formal and informal sports and outdoor activities. Tourism is generally perceived as holidays involving a stay away from home. Cultural and catering facilities are perceived to overlap both sectors. Tourism is driven by many of the same forces as leisure. However, it has important characteristics that must be considered:

- travel is an integral part of tourism whereas in leisure it is generally a means of accessing a desired facility;
- tourism includes business as well as leisure travel;
- leisure (holiday) tourism is often motivated by attractions that are free goods eg historic towns, spectacular scenery and/or assets that are not primarily developed or maintained as tourism businesses, including most historic buildings. These attractions are not footloose, unlike most leisure activities; and
- tourism is not a coherent industry. Rather, it creates economic activity across a wide spectrum of other industries eg transport, hospitality, retailing.
More formal definitions are explored in Appendix II.

1.8 For planning purposes, leisure and tourism uses need to be considered as two separate sectors while appreciating the significant inter-relationships. The most important distinction is regularity of use. Leisure facilities are used on a regular, often spontaneous, basis from home, as part of an individual's normal leisure time. Tourism facilities are used on special, generally pre-planned, non-routine or longer trips including, but not limited to, overnight trips. Although many leisure facilities are used by tourists, and vice-versa, there are significant differences between the uses as defined here, in terms of their land-use planning effects.

1.9 Four groups of leisure and tourism land-uses have been defined (Appendix II):

- **indoor and cultural recreation**: commercial leisure including cinema, bowling, night-clubs, etc; built sports facilities such as stadia, swimming pools and leisure centres; and a group of indoor, urban, footloose leisure land-uses, generally D1 and D2 uses;
- **catering**: similar to indoor recreation but a clearly separate use class (A3);
- **visitor attractions (commercial and non-commercial)**: zoos, theme parks, museums, galleries, visitor centres, heritage sites, gardens, natural features, etc; and accommodation - hotels, holiday villages, caravan/camping sites, along with conference and exhibition centres. This is a mixed group but all tourism related; and
- **outdoor, rural/countryside and informal recreation**: a group of leisure/recreation activities, often with particular site constraints. These are covered by PPG17 and have been the subject of separate research.

1.10 The focus of this research project is on the first three groups of land-use or activity ie the generally foot-loose, urban leisure facilities that can impact on town centre vitality, viability, accessibility and transportation issues (Stage One) plus the special case of tourism facilities (Stage Two).

**Legislation and policy relating to leisure and tourism**

1.11 The law defines development, sets out what is permitted development and, through the courts, indicates what is or what is not a material consideration. The most important statutes and subordinate legislation are:

- the Town and Country Planning Act 1990, noted for Section 54A which gave greater emphasis to the plan-led system;
- the Planning (Listed Buildings and Conservation Areas) Act 1990;
- the Town and Country Planning (Use Classes) Order 1987 as amended; and
- the Town and Country (General Permitted Development) Order 1995.
1.12 Government policy continues to stress the important role of the planning system in meeting the needs of a growing and competitive economy, and in protecting the natural and built environment and amenity (see endnote 1). At the heart of Government Planning Policy Guidance (PPG) notes lie the principles of sustainable development. PPG1 states that the planning system "has a key role to play in contributing to the Government's strategy for sustainable development by helping to provide for necessary developments in locations which do not compromise the ability of future generations to meet their needs" (para. 39).

1.13 The UK strategy for sustainable development (see endnote 2) has four main aims:

- social progress which recognises the needs of everyone;
- effective protection of the environment;
- prudent use of natural resources; and
- maintenance of high and stable levels of economic growth and employment.

1.14 Several other PPGs contain guidance of specific relevance to leisure and tourism:

- PPG6: Town Centres and Retail Developments (revised June 1996) emphasises the need for a plan-led approach to promoting development in town centres. PPG6 is applicable to leisure development as well as retail;
- PPG21: Tourism (1992) emphasises the importance of tourism to the national and local economy whilst protecting the environment and outlining a number of issues;
- PPG13: Transport (1994), currently subject to revision (Consultation draft 1999), provides advice on the preferred location of developments and emphasises the importance of reducing the need to travel, particularly by car. It advises local authorities to formulate local plan policies to concentrate facilities, including leisure developments, in town centres and other locations well served by public transport. (The Transport White Paper (see endnote 3) looks to promote social inclusion by improving public transport; security, accessibility and affordability);
- PPG17: Sport and Recreation (1991) gives guidance on sport and recreation provision and safeguarding open space with recreational value; and
- PPG 12: Development Plans (1999) gives guidance on the broad content and preparation procedures for development plans. It re-emphasises the Government's commitment to a plan-led planning system and stresses the importance of integrating sustainable development, transport and land-use policies in development plans.

1.15 Regional Planning Guidance (RPG) has been issued for each of the 11 planning regions. Generally, the leisure and tourism content has been limited. The draft revised PPG11:
Regional Planning is currently under consideration.

**The final report**

1.16 The report is structured in four Sections:

*Section 1: Introduction*

- Background to the study;
- Trends in leisure and tourism.

*Section 2: Planning for Leisure*

- Planning for leisure; development plans;
- Planning for leisure; development control and appeals;
- Planning for leisure; public and private sector perspectives;
- Leisure case studies.

*Section 3: Planning for Tourism*

- Planning for tourism; development plans;
- Planning for tourism; development control and appeals;
- Planning for tourism; public and private sector perspectives;
- Tourism case studies.

*Section 4: Conclusions and Recommendations*

- An analysis of background issues relevant to leisure and tourism;
- An analysis of key findings and issues related to planning for leisure and tourism with conclusions and recommendations related to DETR, LPAs and the private sector.

**Endnotes**

1. PPG1: General Policies and Principles, DoE, 1997
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### 2. Trends In Leisure And Tourism

#### Introduction

2.1 This chapter considers some of the key drivers for change in leisure and tourism activity. It reviews relevant social and economic trends in leisure and tourism provision and expenditure, trends in leisure and tourism property development, trends in Government policy for leisure and tourism, and outlines some of the impacts of leisure and tourism development. The key issues emerging have been set out at the end of the chapter.

#### Economic and social trends

2.2 A discussion of the general trends in leisure and tourism provides an important context for examining the more specific trends evident in leisure and tourism land-use development. Unfortunately, accurate, uniform, comparable trend data is often not readily available for the fragmented leisure and tourism sectors; the statistics available do not always directly match the definitions of leisure and tourism used in this research. Caution needs to be exercised when making general statements about the sectors from the available data.

2.3 Economic, demographic and social trends shape our consumption of leisure and tourism. Whilst there were some radical changes in leisure development during the 1990s eg the development of leisure parks and eating out places, tourism has tended to develop broadly along established lines, although short-break holidays and urban tourism in former industrial cities a new phenomenon that emerged in the 1980s have consolidated and expanded.

#### Changing incomes

2.4 Disposable income and consumer expenditure have increased by 2.5% pa in real terms over the last 25 years (see endnote 4) and are likely to continue to rise at a similar rate, supporting increased consumer confidence and steady growth for leisure markets in the long-term.

#### Demographic changes

2.5 Demographic changes (see endnote 5) are affecting the demand for different leisure products and thereby reinforcing the unpredictable nature of the leisure sector. The main change is the ageing of the population as a whole. The median age of the population (the age at which there is an equal number of older and younger people) is projected to rise quite sharply from 36 years in 1994 to 40 years in 2009.

2.6 The sex structure of the population is also shifting. The age up to which males outnumber females is projected to increase from age 47 in 1994 to age 61 in 2021.

2.7 The number of children aged under 16 is projected to fall by nearly 9% by 2021 but there are significant short-term shifts, both up and down, within the crucial younger age groups (up
to age 24) that could have significant effects on the market for individual leisure products.

**Social changes**

2.8 Along with demographic change and increasing leisure choice resulting from increased income, a number of profound changes within the structure of society have, over the last 25 years, impacted on our consumption of leisure. (Figure 2.1). Perhaps the most important have been; changing household structures, 'the feminisation of leisure', and time pressure/changing work patterns.

**Figure 2.1:** Social factors shaping leisure trends in the UK - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

**Households**

2.9 There is a significant change underway in the number and structure of households. Household numbers continue to increase as the size of households decreases, due to higher levels of divorce, increased life expectancy, a reduced birth rate, more single parent families etc.

**Feminisation**

2.10 Over the last twenty-five years, the number of women entering the labour market has increased. In 1971, 10 million women were employed in the UK while by 1997 this figure had risen to 12.7 million and it is forecast to rise to 13.1 million by 2001 (see endnote 6). Consequently, the disposable income of women has also increased, which in turn has opened up a new market for special interest female activities notably health and fitness.

2.11 Over the same period, there have been other changes in society which have improved opportunities for women and reduced gender discrimination in both work and leisure contexts. However, some surveys reveal that gender remains an important determinant in terms of access to, and choice of, leisure opportunities:

- Women's access to leisure, in general, has increased but many women still have less leisure time due to work and family commitments, participate less in most leisure activities and draw on a narrower range of leisure options than men. They spend most of their leisure time in and around home and family;
- Actual physical danger or fear of sexual harassment also restricts women's choice of leisure activities and leisure spaces (see endnote 7). Fear for safety is predicted to remain a growing social trend.

**Time availability**

2.12 There are conflicting views on the issue of time availability for both sexes. The working hours of those in low status jobs have reduced, but for many of those in employment, work pressures are actually reducing leisure time (see endnote 8). Even for many not in
employment, there is a perception that time is limited. The time-money paradox suggests that free time is available in inverse proportion to income levels.

2.13 In the light of such constraints on leisure time, there is an increasing need for time-value as well as value for money in leisure and tourism development.

**Leisure and tourism travel and accessibility**

2.14 The presumption that leisure travel is the fastest growing purpose of travel (see endnote 9) needs to be qualified in the light of recent statistics (see endnote 10). Tourism and leisure journeys account for around one quarter of all journeys but the NTS figures show that leisure journeys per person per year have remained static over the last decade (to 1997). Leisure miles per person per year have gone up but less than the overall figure for all journeys.

2.15 Despite the number of households owning cars increasing dramatically since 1961, helping to generate the volume of trips described above, almost 30% of households in 1998 did not have regular use of a car (see endnote 11). In addition, some sections of the population are more dependent on non-car modes of transport than others and where such transport is not available, they may be excluded from access to leisure and tourism activity eg:

- lower income families: three-fifths of households in the bottom quintile of income distribution in 1996/98 did not have a car (see endnote 12);
- children under 17 are legally prohibited from driving motor cars;
- only 58% of women, 38% of the over-70s and 43% of 17-20 year olds hold full driving licences, compared with 81% of men aged 17 and over (see endnote 13);
- in those households with a car the car tends to be used more by the man (see endnote 14).

**Trends in leisure and tourism**

**Leisure trends**

2.16 Leisure spending is generally divided into leisure goods spending and leisure services spending. The former comprises primarily in-home spending on electrical retail goods such as TVs, videos, stereos etc, whereas the latter includes out-of-home leisure spending on cinemas, bowling, gambling, eating and drinking in restaurants and pubs etc, entertainment and other out-of-home leisure activities.

2.17 The growth rate of leisure spending varies depending on exactly what definition of leisure spending is adopted. There are significant variations between sectors and individual activities of overall leisure spending, eg:

- spending on in-home leisure remains about one third of out-of-home leisure spending but
is projected to grow at a faster rate based, in part, on technology and the digital revolution (see endnote 15). In-home leisure spending has experienced much higher growth rates than out-of-home leisure services spending and leisure (goods) spending has significantly increased its share of total consumer expenditure; and

- there is limited quantitative information on the individual leisure activities that are the subject of this study, ie out-of-home leisure spending. These individual markets have the potential for extraordinary rates of growth and decline as has been evidenced in the past, more so than in non-leisure industries. For example, the cinema and health/fitness market is currently projected to continue to grow, ten-pin bowling has arguably reached saturation in recent years while bingo has experienced difficulties in recent years. Individual segments of the pubs/bars/restaurant sector can perform quite differently.

2.18 Business Strategies Ltd (BSL) produces forecasts for different aspects of the economy including consumer expenditure and components of consumer expenditure. One such component is leisure services spending with historical data derived from the ONS (see endnote 16) series on consumer expenditure. Leisure services includes catering (meals outside the home), recreational and cultural services, betting and education. Leisure services expenditure as defined by BSL has shown growth of 2.5% pa in real terms over the last 25 years, the same growth rate as for total consumer expenditure and disposable incomes. BSL forecasts (October 1999) that leisure services expenditure will achieve a growth rate of 3.2% pa over the ten years from 1998 to 2008 (see endnote 17).

Tourism trends

2.19 Since overall tourism activity in the UK is driven by both domestic and overseas visitors, and by leisure and business travel, it is the outcome of the interplay of many different factors. Domestic leisure tourism responds to the same forces as those driving overall leisure consumption (see above), most notably changes in disposable income. Overall, tourism trips have grown significantly in recent years (Table 2.1) but there are important variations:

- short-break holidays have grown steadily (see endnote 18) (partly to do with the general leisure trend of time-squeeze) while domestic long holidays (4+ nights) have declined or remained static. Many traditional coastal resorts have been particularly affected by this trend;
- all leisure day visits increased by 10% between 1994 and 1996 and a further 3.5% between 1996 and 1998;
- overseas visitors to the UK have grown rapidly in recent years; and
- business travel has increased in line with recent economic growth.

Table 2.1: Tourism trips in the UK (000,000s, rounded) - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

2.20 Domestic tourism trips are down in volume on 1997 while international visitors increased
by 1%. BTA estimates continued growth to 2003 in overseas tourism at 3.2% and domestic tourism at 2.6% (all visits) and 3.2% (holiday, mainly short, trips). Business travel responds particularly to changes in the overall level of economic activity in the country. While all day trips showed a 3.5% increase on the previous survey in 1996, tourism day trips showed a 9% increase in England but slight falls in Scotland and Wales.

Leisure and tourism property trends

2.21 In contrast to the main industrial and commercial property sectors, the leisure and tourism property sector encompasses public sector, non-profit making activities and a rapidly growing private, profit-oriented sector. Therefore, the sector comprises several segments (see endnote 19):

- full commercial or business properties eg hotels, cinemas, tenpin bowling, nightclubs, bingo halls, pubs/bars and restaurants;
- quasi-commercial properties, provided sometimes in the public and sometimes in the private sector, eg swimming pools, health and fitness centres, attractions, museums and theatres. These facilities may operate on a partial cost recovery basis; and
- non-commercial leisure properties such as municipal parks.

2.22 These segments do not stay static. Over time, and with increasing affluence, some property types, which were associated with public sector provision, have become more commercial eg some museums, heritage attractions and leisure centres. The following property review is primarily concerned with commercial leisure, the first category summarised above.

2.23 Perhaps the key feature of commercial leisure is that it undergoes continuous change, which a more affluent public both stimulates and is constantly responding to. Some leisure operators and the property they occupy have more recently adapted to deal with changing fashions. It could be argued that cinema, bingo, bowling, hotels and caravans have existed for a considerable time, but what has changed is the manner in which the product is packaged and delivered to an increasingly selective audience. All commercial property sectors, retail, office or industrial, to a greater or lesser extent are responsive to market demands and quick to change, although arguably not to the same degree as the leisure property sector.

Leisure parks/centres

2.24 One of the key property market changes in the 1990s was the concept of grouping together leisure facilities into a leisure park or centre. These vary in size from 3,250m² (see endnote 20) to 28,000m² floorspace, with an average size of 13,000m² on a large site offering easy access and ample parking space for cars (the top priority in the private sector survey undertaken for this research). Other advantages of leisure parks identified by the private sector in the survey in order of priority are:

- a choice of things to do;
• encouragement of repeat visits;
• a safe and well managed environment;
• synergy between leisure uses;
• investor confidence; and
• synergy with retail uses.

2.25 Leisure parks are now seen by the property industry as a long-term change creating economies of scale for developers with benefits to consumers, operators and investors. Over 60 leisure parks have been developed and more are planned (see endnote 21). “The leisure industry is providing something which the consumer didn’t know they liked until they saw it.” (see endnote 22)

2.26 A multiplex cinema is usually the key ingredient for any leisure park or commercial leisure centre and there are few such developments without one. It acts as an anchor for the site and creates the footfall that attracts other complementary uses, such as restaurants, to the same location.

2.27 Tied up with the growth of the multiplex is the dominance of a few multiplex operators. Seven operators controlled over two thirds of the cinema screens in 1999 (see endnote 23). New multiplex operators such as Cine UK and Ster Century from overseas have entered this growing market, pushing up demand and stimulating development activity.

2.28 Major, multi-facility leisure developments appear to be based on faith in the continuing supply-led growth in the cinema market, which has been phenomenal over the last 15 years.

2.29 It is also extremely unusual to find a leisure park/centre that does not have some kind of food offer. Most developers see it as a necessity and there are often five or six different food and drink offers available, from fast food such as McDonald’s, Burger King and KFC, to restaurants such as Pizza Hut, Deep Pan Pizza, Frankie & Bennys and Fatty Arbuckles, as well as pubs. It is also common to find two or three other leisure activities as part of the park/centre, such as ten-pin bowling, bingo or a night-club. In a survey done in November 1997 (see endnote 24), the most popular facilities at multi-leisure parks were cinemas, mentioned by 41% of respondents, restaurants with 32% and pubs and tenpin bowling with 26% and 24% respectively. The least attractive facility was bingo mentioned by 6% of respondents. It is argued that additional facilities increase the attraction of the scheme and the spin off benefits, as long as there is sufficient parking for customers of all the different facilities.

2.30 The leisure park concept has only emerged in the 1990s, but already it is changing with new and larger concepts materialising incorporating retail and a wider range of leisure uses eg SnoWorld Sports Village in Milton Keynes (now branded as Xscape). Typically, these schemes are more than twice the size of a large leisure park, incorporating an indoor ski centre, health and fitness club, other sports facilities, multiplex cinema, 10 pin bowling, family entertainment centre, night-club, restaurants and lifestyle retailing (see endnote 25). They also differ from leisure parks in having all uses in one, large, multi-level building rather than in separate leisure
buildings. Other major leisure schemes include the Printworks and the Great Northern site in Manchester city centre along with Star City, Five Ways and Broadway Plaza around Birmingham.

2.31 The growth of larger scale out-of-centre leisure developments very often in locations that are relatively inaccessible by public transport - combined with the decline of some uses in town centres have made some types of leisure activity less accessible to those wholly or partly reliant on forms of transport other than the car.

Integration of leisure and retail

2.32 These large leisure schemes are notable for the inclusion of a substantial retail element. A natural cross-fertilisation of leisure and retail is considered to exist, so that people using leisure facilities buy something in the adjacent shops and vice versa. Visitors to leisure attractions have become increasingly used to buying theme-related merchandise as part of the leisure experience. Similarly, retailers have looked to leisure as part of shopping centres to encourage a longer visit and thereby spend more.

2.33 One manifestation of this is the number of restaurants and cafes or food courts in shopping centres. Another example is at the Trocadero in the West End, where mainstream retailers such as HMV, Whittards, Sock Shop and Accessorize benefit from the high pedestrian flows by trading alongside major leisure attractions such as Funland, the UGC multiplex and speciality operations such as Planet Hollywood. The same logic applies to the Metro Centre at Gateshead, one of the largest shopping centres in the UK, which has a large leisure centre forming part of the scheme. Nevertheless, there is little hard evidence to show the level of synergy between major retail and leisure elements of large schemes such as the Metro Centre (see endnote 26). This may become clearer as the American Urban Entertainment Centre concept emerges in this country in some of the major developments in Birmingham and Manchester.

2.34 There are also a number of locations in the UK where leisure operators have taken space next to retail parks (and factory outlet centres). Both share a number of common requirements; good location, access, visibility and car parking. It is said to provide the owner with a wider tenant mix, reduce reliance on durable goods retailers and it may introduce a higher rental level per unit of floorspace. A retail park with a leisure element, arguably, has greater drawing power from a wider area, simulating to a greater extent the wider range of consumption activities that exist in a town centre.

2.35 The inclusion of leisure in the design of retail complexes has proved to be a growth area in property development schemes. In some areas, planning authorities are assisting this trend, encouraging a mix of uses with retail and A3 in order to attract people to city centres, in the evening and at weekends, eg Leeds, Manchester, the City of London, Bristol.

2.36 It is clear that this background is a constantly changing situation with a great variety of schemes having at one extreme, retail as an adjunct to leisure and at the other extreme, leisure as an adjunct to retail.
The growth of eating out

2.37 In the mid to late 1980s, a number of factors led to national changes in the drinking and entertainment sectors:

- the Monopolies and Mergers Commission Report required the major breweries to reduce the number of pubs they controlled;
- the change in the Use Classes Order 1987;
- the nationwide campaign against drinking and driving;
- the relaxation of licensing hours in 1988; and
- the growth of drinking and eating out as a leisure activity.

2.38 These factors have led to a concentration of development pressure for (particular types of) A3 uses in areas well served by transport and a diversification of the role of public houses so that alcohol is not the only attraction. Games, entertainment, meals, facilities for children have led to a variety of 'themed' facilities including family restaurants but also 'superpubs', large single-bar pubs attracting a predominantly young clientele.

Tourism land-uses

2.39 The different forms of tourism attractions and visitor accommodation make up a fragmented segment of the leisure property market both in terms of product type and investor. Tourism's growth means that pressure for development is widespread. In land-use terms, the main source of development pressure is for new accommodation.

Hotels

2.40 Over the last two decades, there has been considerable growth in the number of new hotels being developed in the UK. There is a well-established need for more, better quality hotel stock in most segments of the market in the UK and particularly in London. Elsewhere, although new full-service hotels will be developed eg traditional four star, the main area of growth is in budget hotels. Over the last 10-15 years, new supply has been dominated by this sector. (Tomorrows Tourism (see endnote 27) refers specifically to the increasing demand for budget hotels in the context of improving quality.) These developments started in the UK in 1985 (well before PPG13) with the first Little Chef Travel Lodge.

2.41 Budget hotels are purpose-built, low-cost, high quality facilities normally sited adjacent to, and serviced by, a restaurant/bar and situated in positions with good access to the primary road network and commercial areas. They range in size from 40-120 bedrooms. They do not have leisure facilities but some brands do feature small meeting rooms. The concept was developed in response to a need for inexpensive B&B accommodation, particularly for business travellers.

2.42 Growth has been phenomenal. By the end of 1998, there were 27,447 rooms in 554
budget hotels in the UK. This represents an average growth of 21.9% in rooms and 18.6% in hotels. Current plans, if achieved, mean that by the year 2003, there will be in excess of 70,000 bedrooms in over 1,100 hotels, a compound growth of around 20% per annum (see endnote 28).

2.43 Current supply represents less than 3% of the total UK hotel supply. Awareness of the concept is still low and the increasing interest in cheap travel will sustain growth in the market for at least the next decade. Growth might not be at the current rate, given the increases in the cost of land and construction and planning constraints, but pressure for development will be inevitable.

Table 2.2: Annual growth of the budget hotel sector in the UK - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

Caravan sites

2.44 New caravan (and holiday centre) site development in recent years has been limited around the UK. "In many parts of the country, the caravan park industry is mature and the need for brand new parks perhaps limited" (see endnote 29). Planning constraints have also restricted new development on the favoured coastal sites. Projected growth (see endnote 30) may increase development pressures in these areas but the focus of development within the industry is on the enhancement of existing sites, supported by extensions where possible, along with some ad hoc development of inland sites.

Attractions

2.45 There has been an explosion in the growth of attractions overall; 47% of all attractions have been opened over the last 20 years (see endnote 31) although most are small-scale, often involving the opening to the public of heritage buildings or natural features in inaccessible locations. The number of large-scale new attraction developments is small; with the exception of the Dome, the last new major theme park developments were in the 1980s. The newest of England's top twenty charging attractions is Legoland, opened in the early 1990s on the site of the Windsor Safari Park.

2.46 There is a number of new lottery-funded attractions coming on stream in the next two years eg the Eden Project in Cornwall, the Lowry Centre in Salford but it is unlikely that many more will be developed. (These are generally not on the scale of theme parks in terms of site area or visitor numbers.) Public funds for new attractions are now more restricted and there is a real concern about the viability of many new attractions. Priority is now being given by most public agencies to enhancing existing attractions rather than creating new ones.

Destination development

2.47 The growth in day visits and short-breaks in the UK has focused, in large part, upon historic towns and cities and honeypot locations in the countryside. Destinations such as York, Bath and London are well established but new urban destinations such as Bradford, Liverpool, Manchester and Birmingham have developed as tourism products on the back of a mixture of retail, catering, entertainment and formal attractions. In the countryside, the Lakes and Peak District continue to attract large numbers of visitors to the free attractions of beautiful scenery
and the opportunity for outdoor activity.

**Investment in leisure**

2.48 The growth of the commercial leisure sector suggests that a strong case exists for institutional investment in this sector. Yet, until recently this has not occurred and even now is not widespread. The main factors which have deterred investors until recently were:

- the relatively small (but growing) number of leisure operators who were multiples (ie low risk tenants);
- the lack of a large market with comparable market evidence of leasing arrangements, rent levels and yields;
- a valuation technique dependent on the capitalisation of the profits of specific businesses, rather than the capitalisation of market rents;
- the perceived high investment risk in an industry prone to changing fashions;
- the need for large, purpose-built buildings for many new leisure concepts and increasingly high fit-out costs; and
- the perception that leisure property needs intensive, high quality hands-on management.

2.49 A survey undertaken in 1991 ([see endnote 32](#)) into barriers to investment in leisure property, revealed that only 13% of institutions surveyed held leisure property in their portfolio. Two thirds indicated that they would not consider investing in leisure property in the future, although it was acknowledged by 50% of the respondents that leisure held good economic prospects.

2.50 Since the survey in 1991, there has been a considerable change in the outlook and views of institutions towards leisure property due to the trends described earlier in this section and particularly the growth of national multiple companies as tenants and the establishment of long leases in leisure developments. However, the market is still embryonic. It has not established its first generation of growth and the industry is yet to see many major rent reviews on leisure parks. There is still no performance measure because IPD ([see endnote 33](#)) has at present no leisure category and it is still difficult to accurately determine the correct level of yields due to lack of published databases of performance.

2.51 Despite these problems, the leisure sector is now a much more attractive prospect for investors. Multiple operators like Whitbread, Bass, First Leisure, Rank, UCI, Warner Brothers etc have been prepared to take leases of standard leisure boxes (suitable for a range of uses within the building shell), typically of 25 years or more. This is comparable to, if not better than, other property sectors.

2.52 Increased investor interest and higher investment values have contributed to the increase in development activity that has been very marked over the last 3-4 years as the next sub-
Leisure development activity

2.53 The emergence of leisure parks, the significant increase in capital values due to higher rents and greater investment demand have all improved leisure development viability and helped to stimulate a development boom in the late 1990s. New development activity in the entertainment sector (as measured by the DETRs New Construction Orders data series) increased by over 100% between 1995 and 1998 but has since fallen back slightly. The volume of new construction orders (in constant prices) in 1998 was 50% higher than in 1988-89, at the peak of the late 80s boom.

2.54 A comparison of trends in development activity in the commercial property sector over the last two decades reveals some interesting comparisons (Figure 2.2). New construction orders (constant prices) in the entertainment sector were, at the end of 1998, 350% higher than they were at the start of 1981; in the retail sector they were about 180% higher; in the office sector they were about 100% higher, in the industrial sector they were 40% higher and in the private residential sector they were only 10% higher.

Figure 2.2: New construction orders (1995 prices) - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

2.55 The advent of more restrictive planning policies towards out-of-centre development since the introduction of PPG6 (revised) in mid 1996 has forced developers and operators to consider town centre locations. Town centre locations are perceived by the private sector to have a number of problems that may constrain new development, particularly of multi-use leisure developments; they are generally smaller and more expensive to develop and satisfactory car access/parking/security is more difficult to achieve etc. However, a number of schemes are proceeding.

2.56 In the view of some in the private sector, policy constraints have been compounded by the inherent delays in the planning process and the perceived inconsistencies in the decisions made.

Changes in policies for leisure and tourism

2.57 Many commentators consider that there has been a dichotomy in the approach of Government towards leisure uses (see endnote 34). This has its origins in previous centuries and is based on the different views held about the relative merits of different types of leisure activity.

2.58 In the past, the public sector has provided or subsidised many sports facilities, cultural and artistic venues including museums, galleries and heritage attractions. In addition, the state has developed and maintained land for formal and informal recreation. Policies have been designed to offer protection to such uses with legislation such as the Theatre Trust Act 1976, or to promote additional provision. These uses have been considered intrinsically beneficial to individuals and society because of the benefits that they are considered to offer to individual
health, cultural or social well-being, civic pride or social cohesion.

2.59 The importance of tourism to the national and local economies has long been recognised by Government. The English Tourist Board was set up in 1969, and its successor, the English Tourism Council, receives public funding from the Department of Culture, Media and Sport to support the tourism industry. In the past, there has been substantial grant aid for hotels and attractions.

2.60 In contrast, the approach of Government to many other leisure uses in the past has been neutral or negative. Legislation relating to gambling or the sale of alcohol has traditionally sought to control or even discourage such uses, with alcohol consumption and gambling circumscribed by licence and subject to taxation. Policies have generally been aimed at the perceived need to protect society and the environment from the adverse effects of such uses.

2.61 Policies relating to popular cultural uses such as the music hall, its successor the cinema and professional football have traditionally been neutral. Such uses, arguably, were considered to have less intrinsic social or cultural benefit than the arts or were considered to be capable of surviving without subsidy or other assistance. Thus, the majority of Arts Council funding has traditionally been given to the fine or high arts, with massive funding to the four major national companies (see endnote 35).

2.62 Planning policies and decisions have tended to follow this dichotomy of approach with those uses considered to have intrinsic health, social or cultural benefits being subject to policies designed to promote or protect such uses. Very often these uses are publicly provided on the basis of target standards of provision. Thus policies have sought to create or protect open space, leisure centres and swimming pools and to protect theatres from changes of use.

2.63 National and local planning policies for tourism uses have reflected the economic importance of tourism and have been aimed at encouraging tourism development, although this has been balanced with the need to protect the natural and built heritage that attracts tourism.

2.64 Planning policies relating to many commercial leisure uses have, in contrast, tended to be neutral or negative in approach. Thus development plans have not contained policies to promote or protect cinemas, snooker halls, amusement centres, bingo halls, pubs and clubs. Instead, policies have tended to be designed to discourage such uses or to control the external effects of these uses.

2.65 This sharp differentiation in the attitudes of policy makers and decision-makers towards different types of leisure use has begun to be eroded in recent years with a more positive approach adopted towards uses such as restaurants, pubs and cinemas. Increasing attention has been paid to the social, cultural and economic value of many of the uses found in town centres. In the 1990s, national planning policies, including PPG6, have mentioned the positive benefits of such uses and some development plans contain positive policies for developing the evening economy. For example, the cultural and social value of cinemas, as well as their economic value, has been reflected in policy (see endnote 36).

2.66 The value of uses that were often subject only to negative policies, such as pubs and restaurants, has been reflected in changing policy at all administrative levels along with recent
relaxation of licensing laws. The economic value of tourism uses has been reflected in national policy since 1979 (Circular 13/79) and continues to be reflected in policy at local and national levels (see endnote 37). Leisure and tourism have become major catalysts in economic development and regeneration and many local authorities have sought to encourage such projects on the basis of:

- job creation;
- image development; and
- infrastructure support for local business.

Such considerations have often raised significant planning consequences.

2.67 The recent adoption of the principles of sustainable development in planning policies and decisions has had a significant influence on leisure development. In particular, the control of trip generation and encouragement of accessibility by all means of transport have major planning implications for leisure and tourism. In 1994, PPG13 identified leisure travel as the fastest growing purpose of travel and, as pointed out in Chapter 1, travel is an integral part of tourism activity. Travel for leisure and tourism purposes is complex and data is limited.

2.68 The environmental impacts of leisure and tourism development remain a dominating issue in policy terms, generally considered under the following headings (see endnote 38):

- impact upon the built environment. The beneficial re-use of redundant buildings for leisure and tourism has been seen to contribute to the vitality and viability of town centres and bring life to rural areas (see endnote 39). Historic buildings can be preserved and given new uses and the areas in which they are located benefit. At a more general level, leisure and tourism can make a positive contribution to the vitality and viability of town centres. In extreme cases, this can lead to amenity problems and social impact;

- impact upon the natural environment. Visual intrusion is a key aspect to development in the countryside along with the impacts upon air, water, flora and fauna, soil erosion etc; and

- congestion and pollution. Congestion and pollution is largely to do with vehicular transport but it is also to do with pedestrian congestion; the weight of numbers at specific destinations and the nuisance effects of noise, smell, litter and crime/vandalism.

2.69 Visitors can interact with a local community in both a positive and negative manner. They can help to support local communities and services; in some cases, the social value of pubs to rural communities has been recognised in appeal decisions. In other cases, visitors can alter the character of an area, the nature of local shops and disrupt the local community.

Summary of key issues
Leisure and tourism are fashion-led, and have seen a recent development boom. The nature of these sectors poses challenges for local planning authorities, and raises several key issues.

Whilst the economic value of tourism is broadly acknowledged, planning policies may reflect a more ambivalent approach towards other forms of leisure which are often viewed neutrally or even negatively. Planning policies that follow from such attitudes may need to be re-evaluated to take account of new social trends and the growth of leisure in the overall economy.

As part of this, assuming that the development boom is likely to be sustained, it will be important to establish whether there are identifiable land use implications, and what these might be. Leisure and tourism developments will have economic development, community and environmental impacts, including those associated with travel and trip generation. It is not clear whether these are adequately understood and given due weight in the planning process.

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36. Survey of development plans undertaken for this research
37. Most recently, in Tomorrows Tourism, op cit
38. Based upon the Planning Imperatives referred to in, Tourism - Towards Sustainability, DCMS, 1998
3. Planning For Leisure: Development Plans

Introduction

3.1 In this chapter, consideration is given to how leisure has been dealt with in the plan-making process and, in particular, whether plans are incorporating Government planning policy relating to leisure. The chapter reports the main findings of the 1998 survey of LPAs (partially updated in April 2000), a review of a small sample of development plans and wider consultation. Details of the LPA survey are given in Appendix IV.

Background studies

3.2 This section considers the extent to which LPAs are following the advice in PPG6 to consult business interests and the local community, to consider existing provision and work with the private sector to assess need or market demand, and identify locations and sites for development for leisure uses. (Paras 1.5 1.7)

3.3 Less than a third of counties stated that they had undertaken surveys of existing leisure facilities in preparing their adopted or emerging development plans. Nearly half of the other responding authorities (48%) had done so although 44% stated that they had not. An audit of existing facilities is often included in authorities Leisure Strategies, but such strategies are devoted almost entirely to the provision of the Councils own services.

3.4 More than a quarter of all responding authorities stated that they had carried out market demand/needs studies for their adopted or emerging plans. Counties were just as likely to have carried out such studies. Over 60% of all responding authorities stated that they had not undertaken such studies for either their adopted or emerging plans. The number doing such studies is, however, increasing.

3.5 Consultation and liaison with the leisure industry is being undertaken by only a minority of authorities. Only one in three authorities stated that they had consulted or liaised with the leisure industry in preparing their adopted or emerging plans. Again, such liaison appears to be increasing, but nearly 60% of authorities stated that they had not consulted or liaised with the industry in preparing their plans, despite the advice to do so in PPG6.

3.6 PPG6 recommends that LPAs seek (in partnership with the private sector) to identify sites for relevant development. The survey revealed that over 40% of authorities are attempting to identify sites in their emerging or adopted plans. A greater proportion are doing this in the preparation of their emerging plans than did so for their adopted plans.

3.7 Only a small proportion of responding authorities has undertaken research into the planning effects of leisure uses. Only 17% have done so for either their adopted or emerging plans. Again such work appears to be increasing, but the amount of such research work is still very low.

3.8 County Councils were less likely to have undertaken such work than were other authorities. Not surprisingly, urban authorities were more likely than rural authorities to have undertaken
such work, as they face more demand for leisure developments.

3.9 The level of background work and liaison with the industry recommended by PPG6 was slightly higher amongst those LPAs stating that a lack of suitable sites was a major problem. Nevertheless, even amongst these authorities only a minority was undertaking such work. Less than half of such authorities had undertaken surveys of existing facilities during the preparation of their adopted or emerging plans, and only a quarter had undertaken market demand or needs studies. The proportion of these authorities consulting or liaising with the leisure industry was no higher than the proportion of all authorities. Hardly any of the rural authorities reporting concern about lack of sites had undertaken such work.

3.10 An earlier survey undertaken in 1997 (see endnote 1) into planning for commercial leisure by the larger LPAs indicated that less than a third of authorities had undertaken relevant background studies. The survey of all types of authority undertaken for this research revealed that in 1998, an even smaller proportion reported undertaking such work for their adopted plans. The age of many adopted plans provides a partial explanation for this more than two thirds of the statutory development plans of responding authorities were adopted before the publication of the latest version of PPG6 and a greater proportion of authorities are undertaking background studies and liaising with the leisure industry for their emerging plans. Nevertheless, the proportion doing so for emerging plans is still less than one-third.

General locational policies or strategies

3.11 PPG6 advises authorities to set out a hierarchy of centres and a strategy for the location of travel intensive uses, including leisure. Just over half of respondents stated that they included general locational strategies for development, including leisure development, in either their adopted or emerging plans. A review of a sample of plans tended to confirm the findings of earlier research into the implementation of PPG13 (see endnote 2) which found that most plans produced between 1994 and 1996 promoted the location of travel intensive uses in existing centres.

3.12 The review of the plans of those authorities that stated that they did not have a general locational strategy for leisure, revealed that most of the plans did have broad locational strategies for development, although leisure development was not explicitly mentioned. These strategies usually encouraged or favoured development in existing centres and discouraged it outside the urban areas. The broad strategies were not, however, always translated into detailed policies restricting or discouraging development outside centres but within the urban areas. Two authorities with problems of large-scale industrial decline favoured the development of derelict sites, with no reference to locational principles.

Preferred locations: the sequential approach

3.13 PPG6 advises authorities to adopt a sequential approach to site selection and to include criteria-based policies in their plans. Over half the Counties stated that they had policies referring to the sequential approach in their adopted or emerging plans, and one third of other authorities had such policies. Plans adopted before the introduction of the latest version of PPG6 will obviously not contain references to the sequential approach. Rather surprisingly, however, less than a third of Districts, Boroughs and Unitary authorities with plans adopted
after this date include policies referring to the sequential approach, and over a third of the emerging plans of responding authorities do not contain specific references to the sequential approach.

3.14 The review of a sample of development plans indicated that the survey results may underestimate the number of authorities that are (broadly) pursuing the objectives of the sequential approach. A number of the authorities that stated that they did not have policies referring to the sequential approach had policies favouring development in town centres or on sites accessible by public transport; some others had only allocated sites for leisure in central locations. Nevertheless, the review also revealed that some authorities neither had policies referring to the sequential approach nor policies broadly pursuing its principles.

3.15 In April 2000, a survey of those 123 authorities that did not have policies referring to the sequential approach in either adopted or emerging plans was undertaken. This was designed to discover whether compliance with guidance in PPG6 and PPG13 was increasing. Ninety-two authorities (75%) responded, of which 27 (29%) had neither adopted a new development plan nor amended an emerging plan since the last survey.

3.16 The survey revealed that almost a third of the 65 authorities that had adopted their development plan or amended an emerging plan since 1998 had included policies referring to the sequential approach in relation to leisure uses. A further quarter had included site allocations or policies favouring the development of leisure uses in town centres and/or locations accessible to town centres. In addition, a further 7 (11%) of authorities that are preparing issues papers indicated their intention to include such policies in their plans. A third of authorities that had adopted plans or changed emerging plans since 1998 had, however, included neither type of policy. Thus, it appears that, although compliance with Government policy is increasing, a significant minority of authorities are still failing to include policies in their plans that make specific reference to the sequential approach, or adopt its broad locational principles.

Site allocations

3.17 Authorities are advised in PPG6 (1.6), and in PPG12 (3.12), to identify sites for development. Only a quarter of the responding authorities had specifically allocated sites in their adopted or emerging plans for specific leisure uses, and only a third of authorities had allocated sites for non-specific leisure uses or a range of leisure uses. However, almost 60% had allocated sites for mixed-uses that included leisure uses. As would be expected, emerging plans were more likely than adopted plans to contain such allocations, and urban authorities were more likely than rural authorities to have such allocations. Less than 40% of rural authorities had allocated such sites in their plans.

3.18 Some 30% of authorities had prepared committee approved development briefs for sites including leisure uses. Urban authorities were more likely to have prepared such briefs. However, many of the authorities that had not allocated sites in their plans had failed also to prepare development briefs including leisure uses.

3.19 A number of authorities had prepared SPG relating to specific categories of leisure use or topics relevant to leisure use. The content of these documents and planning briefs is described
3.20 Not surprisingly very few of the more rural authorities stated that they had area locational policies, such as defined leisure quarters as referred to in PPG6. Urban authorities were much more likely to have such policies in their plans. More than a third of London Boroughs and Metropolitan Boroughs stated that their adopted or emerging plans contained such policies, although few gave details of the nature of these policies.

**Transport/traffic policies**

3.21 PPG6 and PPG13 advise authorities to take account of the transport implications of policies and proposals. Fifteen of the nineteen Counties responding to the survey stated that they had policies referring to the traffic or transport impact of proposals (the distinction was not made clear), and over 60% of other authorities stated that they had such policies in their adopted or emerging plans.

3.22 Over half of responding authorities stated that they had policies referring to the public transport accessibility of sites. The review of a sample of development plans revealed that the older adopted plans often referred to the capacity of the road network as the criteria for assessing developments. The review revealed also, however, that authorities were increasingly including policies relating to accessibility by non-car modes of transport in their plans, and the majority contained policies promoting travel intensive uses at locations well served by public transport whilst discouraging it elsewhere. This conformed with the findings of the research on the implementation of PPG13 that found that over half of the post PPG13 (see endnote 3) plans contained such policies.

3.23 LB Hammersmith and Fulham have developed a technique for assessing the public transport accessibility of sites and use this measure as the criterion for assessing the appropriateness of locations for different types and densities of development (see endnote 4). A small number of other, mainly Metropolitan, authorities have developed similar criteria. Such authorities are in a small minority, however, and most authorities have not developed detailed criteria in relation to public transport accessibility and merely have general policies favouring development at accessible locations.

3.24 A review of transport policies and parking standards submitted by LPAs revealed that public transport accessibility was used more in relation to parking standards than as a criterion for the location or form of development.

3.25 Many of the plans produced since the publication of PPG13 contain policies encouraging modes of transport other than the private car. As the PPG13 Implementation study noted (see endnote 5), some recent plans include policies or proposals relating to cycle or pedestrian networks. Such policies are contained more frequently in the plans of the more urban authorities.

3.26 A lower proportion of the April 2000 survey sample had policies in their adopted or amended plans that relate to public transport accessibility than did the original sample. Whilst this may at first appear surprising, the sample comprised those LPAs that did not have policies referring to the sequential approach in their adopted or emerging plans in 1998; their lower propensity to include public transport accessibility policies might therefore have been
3.27 Few, if any, policies mention the needs of households without cars for leisure facilities that are accessible by different modes of transport. The preference for town centre locations is almost always expressed only in terms of its contribution to reducing car journeys and the vitality and viability of centres. No policies were found that referred to the relationship between social exclusion and transport or the contribution that public transport can make to reducing levels of exclusion.

**Parking policies and standards**

3.28 PPG6 states that car parking policies should support the locational policies in PPG13, and that standards for all non-residential uses should be expressed as maximum provision, including operational minimum requirements (PPG6, 2.30). This advice is reiterated in Draft Revised PPG13. The overwhelming majority of authorities responding to the 1998 survey stated that they had parking policies or standards either in their adopted or emerging plans, or in SPG. The majority of authorities stated that they have standards relating to specific leisure uses, and many of the others stated that they had more general standards relating to all leisure uses. Of those surveyed in 2000, 36 (55%) of the respondents stated that they had standards relating to leisure uses; 29 (45%) did not.

3.29 An examination of standards (of the 75 authorities that sent details) suggests that the survey responses rather exaggerate the number of authorities adopting detailed standards for specific uses. More common were standards that related to broad classes of use. This finding is more in line with the findings of a study of commercial leisure developments in London (see [endnote 6](#)) which found that few London Boroughs had standards for specific leisure uses and that each application will be treated on its merits.

3.30 Almost all of the authorities submitting details of their parking guidance had standards for D1 and D2 uses, and over a third had standards for A3 uses. A quarter of the authorities had set out detailed standards for each of a number of uses within D1 and D2 Use Classes, although these were often similar and did not reflect the very different characteristics of the uses concerned. Almost half of the LPAs had grouped together uses setting out one standard for D2 uses for places of entertainment with fixed seating (cinemas, bingo, theatres, concert halls) and another for D2 uses without fixed seating (clubs, casinos and halls). These standards were frequently more generous than the national standards in the Revised Draft of PPG13.

3.31 A single standard was usually given for all D1 uses, although a number of authorities had set out separate standards for a number of these uses. Very few standards referred to multiplexes and even fewer mentioned bowling alleys or family entertainment centres. The standards set often reflect the levels of provision desired by operators; for example, the most commonly expressed standard for cinemas is one space for three seats. Standards vary considerably, however, in terms of the maximum level of provision or the minimum level required. They vary, also, in the way in which they were expressed; some are expressed as spaces per patron, others per square metre, and others per participant. What is clear, from the examination of standards, is that there is little justification given for the standards set for leisure uses. There is no evidence that the standards are based on levels of traffic generated by expected.
different uses or the variations in traffic generation between different areas.

3.32 Almost all of the submitted standards adopted before March 1994 expressed their standards in terms of minimum requirements - for both operational and non-operational parking. The study revealed that a number of authorities are revising their standards to take into account the advice in PPG6 and 13. For example, Cumbria has set out strategic policies advising Districts to set maximum levels of provision, designed to avoid competitive provision of parking by neighbouring authorities (PPG13, para 4.5). Nevertheless, not all authorities appear to be heeding Government advice. More than two thirds of the standards produced after the publication of PPG13 and half of those produced after the publication of PPG6 (June 1996) are expressed as minima.

3.33 Almost half of the authorities surveyed in April 2000 that had adopted plans or amended their emerging plans since the 1998 survey, and had standards for leisure uses, stated that they still had minimum standards. Only just over a quarter of all responding authorities stated that they had maximum standards. However, this figure may be an underestimate, as at least two respondents misinterpreted the question. One stated that they had no standards when in fact they used the county's maximum standards; another stated that they had minimum standards, but enclosed county maximum standards with their reply.

3.34 PPG13 advised authorities to “adopt reduced requirements for parking for locations which have good access to other means of travel than the private car.” (para 4.6). Half of the standards adopted after PPG13 follow this advice. Several LPAs have devised sophisticated accessibility criteria as the bases for determining parking provision eg Salisbury, South Somerset. This may not be in accordance with the advice in the Revised Draft PPG13. In addition, while many of these LPAs have set maximum standards for more accessible locations, some of those setting out maxima in accessible locations have set minimum standards and no restrictive maxima for less accessible locations. This may create the “perverse incentives for development to locate away from town centres” referred to in the Revised Draft of PPG13 (para 33).

General policies for leisure uses

3.35 More than three-quarters of responding authorities stated that they had general policies for the defined leisure uses in their adopted or emerging plans. The majority of policies relates to publicly or privately provided sports and recreational uses including activities in the countryside, although a significant number of plans contained broad policies encouraging arts, cultural and entertainment uses. Such policies were more prevalent in the plans of urban authorities. Few of the rural authorities had specific policies encouraging Arts, Culture and Entertainment (ACE) uses.

3.36 A quarter of the Counties and almost half of the other responding authorities stated that they had policies protecting some of the defined leisure uses. For example, LB Islington has a policy discouraging changes of use from arts and entertainment facilities and LB Kensington & Chelsea has a policy that seeks to replace cinemas or theatres that close. The Cambridge Local Plan states that it will refuse proposals for changes of use of recreational facilities in the central area, including theatres, cinemas, night-clubs and galleries unless the facility is replaced in an acceptable location elsewhere in the central area.
3.37 Almost 20% of Boroughs, Districts and Unitary authorities stated that they had policies discouraging certain leisure uses. The review of plans indicated that the majority of these policies were designed to discourage particular uses in locations considered likely to cause problems for residential amenity, such as noise and nuisance, or likely to cause traffic problems. Some policies were designed to discourage leisure uses outside centres.

3.38 Another feature was policy to protect retail use from changes to A3 or amusement uses, particularly in core frontages. A number of authorities have policies that discourage leisure uses if they are considered to affect the character of an area. Worthing states specifically in their plan that there is no scope for a cinema in the plan area.

**Policies for specific leisure uses**

3.39 20% of authorities stated that they had policies relating to leisure parks and 10% of non-county authorities and 20% of counties had policies for cinemas/multiplexes. Over a third of all authorities stated that they had policies relating to other defined commercial leisure uses. Recent adopted plans and emerging plans are more likely to contain such policies, and urban authorities were, not surprisingly, more likely to include such policies in their plans. A quarter of Boroughs, Districts and Unitary authorities stated that they had policies for publicly provided uses such as swimming pools.

3.40 Research in 1997 (see endnote 7) found that 74% of the responding authorities claimed to have specific policies for commercial leisure uses. Detailed examination by the consultants of the extracts of plans submitted by authorities found that only 5% of the authorities had policies referring specifically to commercial leisure, although almost 20% had policies referring to major leisure facilities that implicitly refer to commercial leisure. LPAs submitted extracts referring to a wide range of uses, including open space and nature conservation, as examples of relevant policies. This, the BISL report concludes, indicates a lack of understanding of the term commercial leisure.

3.41 The review of a sample of development plans carried out for this research indicated that over half of the plans had policies of relevance to, and often encouraging, commercial leisure uses in centres. Rather fewer plans, however, had policies for specific commercial leisure uses than would have been expected from the survey results. Nevertheless, it appeared that more recently adopted plans and emerging plans were more likely to include such policies and that rather more plans included such policies than the BISL research reported.

3.42 Policies for A3 uses occurred frequently in plans. Although these are usually restrictive in nature, a few do contain an acknowledgement of the important contribution of such uses to the diversity and vitality of centres, and are encouraging such uses in appropriate locations.

**Planning agreements (see endnote 8)**

3.43 More than a third of the responding authorities stated that they have policies in their adopted or emerging plans seeking (undefined) community benefits. Such policies occurred much more frequently in urban areas. Over 80% of London Boroughs and over half of the larger metropolitan and urban authorities had such policies.
3.44 An examination of development plans suggests that few of the policies relating to planning obligations state that such policies apply specifically to leisure or tourism developments; generally they make no reference to the types of development to which the policy is applicable.

3.45 Many policies give examples of the types of obligations that may be sought. Some, such as the provision of affordable housing, are not relevant to this report. Others are more relevant. These include: replacement, improvements or contributions to public and community transport; open space, pedestrian access, landscaping or other environmental schemes; conservation of the built or natural environment; appropriate social, educational, recreational or other community facilities. Many of these may be appropriate in larger leisure or tourism developments. (The replacement of, or contribution towards, leisure provision may be considered to fall within policies relating to community facilities while tourism provision would probably not.)

**Supplementary planning guidance**

3.46 PPG12 notes that SPG can play a valuable role in supplementing plan policies and proposals (3.17). Over a quarter of responding authorities stated that they had drawn up development briefs, and a small number of respondents had prepared non site-specific SPG of relevance to leisure uses. The most frequently occurring topic for SPG relating to leisure is for A3 uses. Almost one sixth of non-county authorities had prepared SPG on this topic, the majority of which were the larger urban authorities and particularly the London Boroughs. A similar number of authorities had prepared SPG on town centres. Less than 10% of respondents had prepared SPG on commercial leisure uses.

3.47 Most of the SPG notes on A3 uses contain general policy advice on appropriate locations and operational restrictions, although a few were restricted to specific guidance on ventilation systems and hours of operation. Most of the SPG notes appear to have been produced in response to the loss of retail uses in town centres and/or amenity problems or an over-concentration of uses. Most of the notes contained policies of a restrictive nature, although several explicitly acknowledged the contribution that A3 uses can make to the vitality and viability of centres.

3.48 Almost all of the authorities that had prepared SPG relating to non-A3 forms of commercial leisure were in the south of England and most related to cinemas and multiplexes. The nature of this guidance varied. Some authorities had prepared guidance in response to single or multiple applications; others had prepared policy documents containing a methodology for assessing proposals. Hampshire County Council, in conjunction with its constituent Districts, has prepared guidance for multiplex cinemas. Norwich has prepared a methodology for assessing multiplex cinema applications. Kingston upon Hull has acted as lead authority in reviewing RPG12 (Yorkshire and Humberside) with particular reference to major commercial leisure developments and LPAC has produced advice for London authorities on major commercial leisure developments.

3.49 Few rural authorities have prepared SPG on town centres but approximately a quarter of LPAs of all other types stated that they have prepared such guidance. (A number of other authorities had prepared town centre strategies that contained references to the planning policies for leisure.) Most of the SPG notes broadly encouraged the development of leisure
uses in town centres. Several identified sites for major leisure developments such as multiplex cinemas, bowling and sports uses. Several, including Bradford and Wolverhampton, had defined quarters where cultural uses, including leisure uses, will be encouraged.

3.50 Planning briefs including proposals for leisure uses have been prepared by almost a third of authorities, primarily those in the more urban areas. Many of these briefs state merely that unspecified leisure uses would be appropriate on the site concerned, but some specify the particular type of leisure use that is being sought. Approximately a quarter of the briefs reviewed included multiplex cinemas as an appropriate use, and several included night-clubs, sports facilities and bowling as appropriate uses. Most included A3 uses as appropriate, although a small number specifically excluded such uses. Several of the briefs were devoted solely to sport and recreation uses and excluded commercial leisure. The majority of briefs were for brownfield sites, in or on the edge of town centres, or accessible by public transport.

**Related strategies**

3.51 One third of non-county authorities have prepared town centre strategies. A slightly larger proportion has prepared leisure development strategies.

3.52 Most of the town centre strategies acknowledge the importance of leisure to the vitality and viability of the town centres and encourage a broad range of leisure uses. Most include references to planning for leisure developments and some identify sites for leisure uses. These elements could be incorporated in development plans, as PPG6 advises. However, many of the documents contain broad guidance on matters that could not easily be incorporated into development plans and several are primarily promotional documents designed to attract investment. Several had town centre management action plans which contained policies for improving the physical environment as well as details of measures to improve safety and security, refuse collection, information provision and promotional events.

3.53 The leisure development strategies were primarily concerned with the provision, development and funding of local authority leisure services such as indoor and outdoor sports and open spaces. They are rarely adopted as SPG. Over half of the documents had sections devoted to the arts, which usually included museums and libraries, but few included more than a passing reference to commercial leisure facilities such as cinemas, bowling or bingo. Of 33 leisure strategies submitted in the LPA survey, 32 were devoted primarily to sport and recreation and local authority services.

**Site assembly and assistance with funding**

3.54 Over a third of responding authorities stated that they had facilitated the assembly of sites for leisure developments or developments including a leisure component. Again, urban authorities are more likely to have undertaken such action. Almost half the metropolitan and London authorities responding to the survey stated that they had, whereas less than 20% of the more rural authorities had done so.

3.55 The uses most frequently mentioned as having been included in the sites which local authorities had helped to assemble were commercial leisure uses. 20% of all non-county authorities and a third of metropolitan Boroughs and London Boroughs had facilitated the
assembly of sites containing such uses. Over 13% of all responding non-county authorities had helped in the assembly of sites containing sports uses. Urban authorities were more likely than rural authorities to have undertaken such action. Only two authorities stated that they had assisted in the assembly of sites containing arts uses.

3.56 Over half of the responding authorities stated that they had bid for Lottery or other Government funding for leisure developments. More than two thirds of the bids were for sports developments, 20% were for arts schemes and 14% for developments including tourism uses.

**Summary of key issues**

3.57 Planners are advised in Government policy to be co-operative and pro-active, to develop an understanding of the leisure market, to identify sites etc. Such an approach is not found universally; the potential benefits need to be better understood, and ways found to encourage wider adoption by local authorities.

3.58 The research indicates notable speed of change in the leisure industry, which raises concerns about how well local authorities are equipped both to recognise trends and to ensure that their policies will remain relevant through the life of the development plan. Whilst many plans have broad leisure policies, there is an issue about whether some plans could have been more fully developed to include policies for specific leisure uses and make site allocations for leisure.

3.59 Some authorities have used Supplementary Planning Guidance (SPG) to control the type, location and concentration of leisure developments. This raises the question of whether there is scope for LPAs to be more positive in the SPG that they prepare, and whether it could be used more often as a tool for leisure planning including site allocations.

3.60 LPAs will need to think through the implications for leisure land uses of other policy objectives for example the new approach to parking standards, and combating social exclusion.

**Endnotes**

1. BISL Research Project: Leisure development policies and proposals in development plans, Thorburns, 1997. (A postal questionnaire survey of 129 non-County LPAs with a population >120,000 supplemented by an examination of a sample of development plans.)
3. DETR (1997) op cit
5. DETR (1997) op cit
7. BISL op cit
8. See Appendix V
4. Planning For Leisure: Development Control And Appeals

Introduction

4.1 This chapter considers the results of the LPA survey that relate to development control and the results of desk research into a sample of planning appeal decisions on leisure proposals.

Background studies

4.2 LPAs were asked whether they had undertaken any background studies, research or liaison with the leisure industry in the process of considering planning applications. One in four of the responding authorities had carried out surveys of existing facilities in response to planning applications received. Only 13% of Boroughs, Districts and Unitary authorities had undertaken market demand/needs studies in response to applications even though a much larger proportion of authorities than this reported receiving applications for which such studies might be considered necessary.

4.3 Just under half of the responding authorities had received or required Traffic Impact Assessments (TIAs) although no distinction was drawn between transport and traffic assessments. These were required largely in relation to mixed leisure developments and related to sites in all locations including town centres. Such studies were more prevalent in the urban authorities, although over a third of the most rural authorities had received such assessments.

4.4 Only eight of the 180 responding non-county authorities reported having received Statutory Environmental Impact Assessments, although a further 12 reported having received non-statutory assessments. Again, such studies were more common in the urban areas. Only eleven authorities reported receiving or requesting air quality studies.

4.5 28 (16%) of the responding authorities received studies of the need or demand for the leisure uses proposed in applications, although need was considered one of the main issues in relation to only 5 (2%) of the examples of major leisure developments. The studies related to a variety of uses ranging from multiplexes to leisure centres and swimming pools. Again, urban authorities were more likely to have received or required such studies.

Examples of applications for major developments

4.6 103 of the 180 relevant responding authorities gave examples of applications dealt with over the last two years. A total of 213 examples were given. More examples were given by urban than by rural LPAs. The type of developments and their locations are shown in Table 4.1.

Table 4.1: Major developments and their locations 1996-1998 - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

4.7 As many of these applications were for developments containing more than one use, it
does not give a precise indication of the extent of different land-uses in the sample. For example, two thirds (138) of all developments included A3 uses; most of the mixed leisure developments also contained A3 and other uses. Those in town centres usually contained fewer different elements - frequently two main uses plus A3 - than those located on edge or out-of-centre/town. Those uses most frequently cited and their locations are set out in Table 4.2 below.

**Table 4.2**: Uses included in the examples of applications 1996-1998 - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

4.8 Nearly 60% of the examples were in town centres or edge-of-centre compared with 27% out-of-centre and 11% out-of-town.

**Decisions**

4.9 Of the 213 cases, 134 had been determined by the LPAs, 55 were awaiting determination by the LPA and 4 had been referred to the SoS. A further 4 were subject to appeals. Nine applications had been called-in, seven had been withdrawn, in several cases due to initial opposition from the LPA. The sample contains a higher proportion of call-in cases than would be expected from a sample of this size and rather less appeals.

4.10 Of the applications determined by the LPAs, 85% were approved; the approval rate of the sample is therefore similar to that for all applications (see endnote 9). The refusal rate for out-of-centre (34%) and, to a lesser extent out-of-town developments (25%), was considerably higher than for town centre and edge-of-centre developments. A further 7 out-of-centre applications and 1 out-of-town application had been called-in by the SoS. One edge-of-centre application had been called-in. The location of the developments and the decisions made is set out in Table 4.3.

**Table 4.3**: Decisions by location 1996-1998 - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

4.11 The small number of cases refused permission (20) and the nature of the sample (self-selected by respondents) makes it difficult to draw firm conclusions about the nature of developments refused by LPAs. However, there was a much higher refusal rate for out-of-centre and out-of-town developments than for town centre and edge-of-centre developments. In fact, two of the town centre developments were refused by one authority based on an analysis of need.

4.12 Only one of the major developments containing a mixture of leisure uses was refused permission although 17 of the examples were located on out-of-centre or out-of-town sites. Three of those on such sites were, however, called-in.

4.13 Two thirds of the 36 applications including leisure/sports centres or pools were in out-of-centre or out-of-town locations. Only 2 of the 21 such applications determined by the LPA were refused, however, and both of these applications were for developments in which the leisure/sports centre was not the principal use. All of the applications in which the leisure/sports centre was the principal use and which had been determined by LPAs were
Main issues considered by the local authorities in the applications

4.14 Overall, issues relating to the location of developments, their accessibility by public transport, their impact on town centres and other considerations in PPG6 were raised in relation to 40% of all examples. Such issues were mentioned in approximately half of the applications for out-of-centre and out-of-town developments. The more specific issues raised by the LPA respondents are set out in Figure 4.1. The most significant are covered in more detail in the following text. These issues are then reviewed in the context of planning appeal decision letters.

Figure 4.1: Proportion of applications in which main issues were raised - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

Public transport accessibility and location

4.15 Public transport accessibility was the most frequently mentioned issue, although this criterion is used by some authorities not in relation to determining the acceptability of the location, but in assessing parking levels on town centre and edge-of-centre sites (see Chapter 3). Nevertheless, the issue was identified in 26% of out-of-centre cases and in these cases it is probable that it was considered in relation to the acceptability of the location. LPAs mentioned location in relation to over a third of all cases.

Traffic and parking issues

4.16 Traffic issues were considered important in over 15% of the cases, although in only 2 of the 14 cases refused by authorities was it a contributory factor to the refusal of the case. Parking was an issue in 14% of all cases, and 20% of town centre and edge-of-centre cases, although none of the cases in which it was mentioned were refused by the LPA. Responses to other questions in the survey and the review of parking standards of a sample of authorities revealed that many authorities continue to apply minimum standards to developments. The concerns of some authorities in relation to parking appear to be the inadequacy of parking provision rather than the need to minimise parking.

Vitality and viability of the town centre

4.17 The impact of the development on the vitality and viability of the town centre and town centre regeneration was mentioned in 25% of cases, but almost half of the references were to the positive effects of town centre cases. The potentially negative effects on the vitality and viability of town centres were mentioned in relation to only just over 10% of out-of-town and out-of-centre cases. Few authorities appear to consider this to be a major issue. This conclusion appears to be confirmed by the response to another question which revealed that only 16% had undertaken research into the planning effects of leisure uses in response to planning applications.
**Design and amenity**

4.18 Design and Conservation/Listed Building issues, including scale of development and the effect on the character of the surrounding area, were mentioned in relation to 14% of all cases. They were mentioned primarily in relation to developments on town centre and edge-of-centre sites. Only two of the cases in which these factors were mentioned were refused permission. In several cases the impact of the development was seen as positive, enabling environmental improvements or the restoration or retention of a Listed Building.

4.19 Only 10% of authorities mentioned residential amenity as an issue in relation to major developments and none of the applications in which this was mentioned was refused permission by the LPA. This contrasts with the response to the survey question about smaller leisure developments and A3 uses. Over 80% of authorities stated that the effect of such developments on residential amenity was a problem with such developments.

4.20 The impact on the local environment was considered an issue in over 10% of out-of-centre and out-of-town cases. None of these applications was refused, however.

**The sequential test and need**

4.21 The sequential approach was mentioned specifically as an issue in less than 10% of all cases, and in relation to only 12% of the out-of-centre and out-of-town developments. Need was mentioned as an issue in relation to only 5 (2%) of the cases, although in response to another question, a slightly larger number (13%) of authorities stated that they had undertaken market demand/needs studies in response to applications. (A quarter of respondents stated that they had carried out surveys of existing facilities in response to planning applications received.)

4.22 Of the 48 out-of-centre and out-of-town applications determined by authorities, 15 were refused. In only 5 of these cases were these PPG6 issues considered as among the main issues in the case. They were, however, mentioned as important in all 8 applications that had been called-in.

4.23 In relation to the 33 out-of-centre and out-of-town applications approved by the LPAs, the above PPG6 issues were mentioned in less than half of the cases.

**Regeneration and employment**

4.24 The contribution of developments to regeneration and employment aims was mentioned in relation to 16% of the cases. In 6 of the 33 out-of-centre and out-of-town approvals it was considered to outweigh PPG6 considerations. The issue was mentioned also in relation to 4 of the 9 call-in applications. As applications are called-in when authorities indicate that they are minded to approve applications, this suggests that in these cases also the LPA considered employment and regeneration issues to outweigh PPG6 considerations.

**The development plan**

4.25 The development plan or a planning brief was mentioned as an issue in 14% of all cases.
In relation to town centre and edge-of-centre cases it was usually mentioned as a positive consideration, whereas in relation to out-of-centre and out-of-town developments it was the conflict with the plan or brief which was considered the issue. It was an issue in 5 of the 15 out-of-centre and out-of-town applications refused by LPAs.

**Consolidation, replacement and mixture of uses**

4.26 LPAs mentioned several other issues that were seen as positive considerations in relation to applications. The consolidation of leisure uses on a site and the replacement of leisure facilities were seen as beneficial aspects of some 7% of developments. The creation of mixed-use sites was mentioned as a positive feature in only 3% (6) of cases.

**Planning obligations/agreements**

4.27 Planning agreements were not raised as an issue of concern by LPAs (see endnote 10). The introduction of impact fees and other alternatives to the current system were not mentioned in the surveys. Almost 40% (67) of responding non-County authorities stated that they had entered into planning agreements in relation to major applications including leisure uses. Over 60% (113) stated that they had not. Urban authorities were found to be much more likely than rural authorities to enter agreements including over half of the London Boroughs and Metropolitan Districts, and a third of larger towns and cities. LPAs in London and the south east were more likely than those in other regions to have entered agreements. This may be due to the greater development pressure in the former areas, but alternatively could be merely a reflection of the larger proportion of urban authorities.

4.28 The overwhelming majority of these agreements related to highway works or commuted payments for parking or public transport. 66% of the authorities had entered into agreements concerning highway works, 37% for commuted payments for public transport and 20% for commuted parking payments. Over 20% provided details of agreements relating to the provision of public access to leisure facilities and nearly 15% had entered into agreements designed to control the uses, activities or hours of operation of the permitted development. 15% of authorities had entered into agreements relating to public art or environmental works.

**Analysis of leisure appeal decisions**

4.29 An analysis was carried out of a sample of appeal decisions concerning leisure developments and developments with a significant leisure component issued between June 1996 and February 2000. The sample covered decisions made after inquiries and hearings, but no cases dealt with by written representations. Less than 20% of all appeals are dealt with at inquiries and hearings, and it is primarily larger developments that are dealt with in this way. Certain types of appeal - for example pubs and restaurants - are therefore underrepresented in the sample.

4.30 The total of 76 cases is divided into 8 use categories. Table 4.4 shows the percentage of appeals allowed and dismissed by main use. Given the small numbers involved, these should be seen as impressionistic rather than statistically significant.

Table 4.4: Appeals allowed and dismissed by main use - available from the 'Figures and
4.31 Over half (51%) of the sample of leisure appeals was allowed compared with approximately one third of all appeals. In the sample reviewed there were considerable variations around this norm. 90% of drive-through restaurant appeals, 75% of appeals involving single leisure uses and stadia and 50% of pubs and restaurants were allowed. In contrast, none of the appeals involving mixed retail and leisure uses and only 25% of leisure parks were allowed.

4.32 Decisions were analysed to assess the emphasis given by the Inspectorate and, where relevant, the SoS to specific issues (Table 4.5).

Table 4.5: Planning issues in leisure appeals - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

4.33 This review of appeals raises a comparable set of issues to those raised by LPAs in the survey above but the appeal decision letters offer a better insight into the interpretation of advice in the relevant PPGs, particularly issues relating to the sequential approach. Some of these key issues are explored below. (Owing to the long gestation time for many Inquiry reports, a number of the decision letters refer to Inquiries that were held whilst the revisions to PPG6 were still at consultation stage.)

4.34 Of the 76 appeals examined, 31 were determined by the SoS; 25 cases were called in and 6 recovered (Table 4.6). Generally the SoS and the inspectors were in agreement although there were variations in emphasis (see endnote 11) and interpretation (see endnote 12). The SoS reversed the Inspectors decision in only five cases (see endnote 13); in all but one of these it was to a refusal/dismissal. In two appeals (see endnote 14), circumstances had changed since the Inspectors report. The reasons varied for the remaining three:

- at Eastleigh there was a fundamental difference of opinion over the application of the sequential approach and congruence with local and national policies (see para 4.49 below);
- in the other two cases the inspectors noted the fine balance of the decision but their views were not accepted by the SoS:
- on a proposed marina at Northam, the SoS considered that an enabling development of permanent housing - which would be contrary to both local and national policies - was unacceptable since the benefits of the marina did not outweigh the harm caused; and
- at Seaham, on the other hand, the SoS overturned the inspectors recommendation of refusal because of the over-riding importance of regenerating the former coalfields area (para 4.59 below). He disagreed with the Inspectors conclusions on the degree of compliance with the development plan. He also disagreed that the proposal would unacceptably affect overall travel patterns and car use and that there was an available, suitable alternative site.

Table 4.6: Appeals determined by the Secretary of State - available from the 'Figures and
Accessibility and traffic

4.35 Inspectors treated accessibility in a variety of ways. Some appeals appeared to completely ignore issues of traffic generation eg drive-through restaurants, although in some cases emphasis was given to the impact on the capacity of local roads/junctions and the ability to deal with the increased flow of cars generated by the scheme (see endnote 15). Other appeals went into considerable detail not only on public transport but also looking at pedestrian and cycle access, timings from bus stops, the gradient of the route etc (see endnote 16).

4.36 Physical capacity predictions on road junctions etc did not appear to be a problem. Difficulties arose when looking at wider planning issues such as:

- whether journeys would actually be shortened because the desired facility was brought closer to home;

- whether users would already be on the road so the proposed facility would make little contribution to overall trip generation (see endnote 17); or

- the extent to which linked trips would be generated (see endnote 18).

In many cases, it appeared that decisions were reached with little evidence to back them up or on the basis of hearsay eg they were "told that many patrons walk" (see endnote 19).

4.37 The additional trips generated by the release of latent demand for cinema visits was a major concern raised in relation to one appeal (see endnote 20). Although the Inspector noted that the new multiplex would capture trips made by existing cinema-goers and hence reduce the car travel by this group of users, he noted that three-quarters of the facilitys total patronage at 2001 would be newly generated trips. "Thus millions of additional vehicle kilometres would be generated by the development". The SoS gave particular weight to this conclusion.

4.38 The link between late night uses and public transport availability was not fully addressed; two out-of-centre sites where the bus service ended at 23.30 were deemed suitable for night-clubs (see endnote 21). In one of these (Ryedale), the Inspector specifically stated that the proposal was in line with advice in PPG6 because it "would be highly accessible by public transport".

4.39 A number of appeals included proposals or legal commitments from developers to subsidise improved bus access. However, doubts were often expressed that the service would generate sufficient users to continue once financial support was withdrawn eg Colchester, 6 month subsidy; Rotherham 4 years free service on two routes.

Vitality and viability of town centres

4.40 This issue received little attention in many of the appeal categories. It was considered in:
• two of the eight pub appeals: one in which the effects on the vitality and viability of the local urban and rural economies were considered likely to be unacceptable (see endnote 22) and one where the impact was not significant enough for dismissal (see endnote 23);

• four of the fifteen drive-throughs: in all cases the impact was felt to be acceptable (see endnote 24). In two of the cases, the Inspector decided the development would sustain and enhance the town centre (see endnote 25);

• two of the four single uses: one social club was held to have a potentially adverse impact on future development and thus vitality and viability of the town centre (see endnote 26), the other night-club was held to be acceptable (see endnote 27);

• vitality and viability was identified as an issue in two of the indoor sports facilities (see endnote 28). In one of these (see endnote 29), both the inspector and the SoS accepted that, since the proposed fitness and rehabilitation centre was a new concept, its impact was difficult to assess. They did not foresee an adverse impact upon the town centre but stated that any changes would require planning permission;

• in three stadium cases (see endnote 30) where a retail element was included: the discussion related only to that aspect of the scheme; and

• of the eight appeals on mixed leisure and other uses, five (see endnote 31) concentrated the discussion on the retail impacts, another discussed both retail and leisure but the conclusions related only to shopping (see endnote 32). The final two appeals, on adjacent sites, were both held to have a potentially negative impact on future investment on the nearby town centre (see endnote 33).

4.41 For the fifteen leisure parks, vitality and viability were discussed in all but five cases: two in the town centre (see endnote 34) and three in former docks, now regeneration areas (see endnote 35). In four of the six cases that were allowed (see endnote 36), the Inspector found that vitality and viability were either enhanced or not significantly affected and that the sequential test had been followed.

4.42 In the case where the Inspector and the SoS differed on the locational definition (para. 4.54) (see endnote 37), the Inspector considered that the proposed facilities would add to the diversity of the town centre and contribute significantly to the evening economy. The SoS did not comment on this view but agreed with the Inspectors assessment of the need for, and benefits of, the scheme, but considered that the proposal failed the sequential approach. At Eastleigh, where the SoS overruled the Inspectors decision, the SoS made no comment on the Inspectors view that the proposed scheme would have no significant impact on nearby town centres.

4.43 The negative impact on the future vitality and viability of town centres was one of the reasons for the three other refusals (see endnote 38). In Colchester, the Inspector stated "the loss of a town centre or edge-of-centre cinema to one located on the appeal site would, I believe, adversely affect this linkage [an LPA survey found 60% of cinema visits linked to visits to other town centre uses] to the detriment of the overall long-term vitality and viability of the centre". In the Rotherham case the Inspector concluded that "while it would have no material
impact on Rotherham town centre or other town centres, the proposal would have a significant adverse effect on the future vitality of Sheffield city centre and of its evening economy, and would be potentially harmful to the evening economy of Crystal Peaks district centre. In the case of the city centre, this would mainly be due to the disincentive effect upon private sector investment in the centre, which investment will help to safeguard its vitality.”

4.44 In Sunderland, after the inspector had reported to the SoS on a proposed out-of-centre leisure park, the LPA granted permission for a multiplex on a town centre site. The Inspector had doubts about the 'deliverability' of the town centre scheme. However, the SoS considered that the key issue was the markets ability to accommodate one or more cinema schemes "in the context of the need to sustain the vitality and viability of the city centre". On the evidence, the SoS believed "that only one multiplex should be accommodated in Sunderland", the town centre site had the clear locational advantage and he refused the out-of-centre application.

**The sequential approach**

4.45 The Governments Response to the Fourth Report from the House of Commons Select Committee mentioned that the key tests in PPG6 are applicable to larger-scale leisure developments. The Response did not, however, attempt to set out a threshold. It is unclear from this review whether Inspectors consider there to be a size threshold as they did not make explicit their reasons for failing to apply the sequential approach or other key tests in those cases in which they were not discussed.

4.46 In one case (see endnote 39) the Inspector did make explicit her reasons for applying the sequential approach. She argued that it was justified because the proposal was relatively large-scale and would be likely to adversely affect the health and vitality of city and district centres. In addition, she referred to the Councils SPG on PPG6 which sets out a threshold for the size of development to which the sequential approach should be applied.

4.47 The Governments Response referred to alternative sites. It made clear that the onus is on the developer to demonstrate why the proposed development could not be accommodated in a town centre or edge-of-centre location. In Peterborough, the Inspector commented on the failure of the appellants to produce evidence that they had sought to locate the (relatively small-scale) proposal, a pub/restaurant, anywhere other than the appeal site and noted that the Council had identified a number of possible alternative sites. Although she was unable to assess their suitability for the development, she considered that the appellants should have undertaken an assessment of alternative sites.

4.48 In another case (see endnote 40), the Inspector stated that even if a development satisfies the sequential approach and that no other more central sites are available, this does not mean that the development should necessarily be accepted. He noted that "the locational test is expressed as a sequence of preferences, with no commitment of positive support for an out-of-centre site even if there are none in or on the edge of a town centre." At Abingdon (see endnote 41), the Inspector queried the conviction of both the council and the developer that a new cinema had to be an 8 screen multiplex. He believed that the site search had been largely misdirected because only sites for an equivalently sized scheme had been considered. The SoS was also not satisfied that all the potential town centre sites had been properly assessed.

4.49 In Eastleigh (see endnote 42), dismissal was on the grounds that the sequential approach
had not been properly applied, town centre sites for a more modest scheme had not been explored, the proposal was not being co-located with other existing out-of-centre uses and the site was not well served by public transport. Although the SoSs decision received considerable publicity in the specialist press, decision letters after that date demonstrate that the sequential test has not always been applied as suggested.

4.50 The treatment of whether a proposed development could be dis-aggregated or split into some or all of its component parts varied between the appeals examined. Some Inspectors were sympathetic to economic arguments such as the need for cross-funding from the commercial element to make the whole proposal viable eg:

- Bolton football stadium with housing, leisure, retail and industrial space;
- a mixed retail and leisure scheme in St Helens (refused on other grounds); and
- the Lichfield scheme was said to be the minimum size to attract funding to a marginal location (see endnote 43).

4.51 In one case (see endnote 44), the Inspector considered that PPG6 did not apply to the sports facilities proposed. "While it is true that the proposal is intended to provide a number of non-sporting facilities, these are ancillary to the main purpose of the development, and dependent on the primary use of the building and the site. The predominant emphasis would be on indoor and outdoor tennis, with opportunities for other sports, together with leisure activities commonly associated with sports and sporting functions. Under such circumstances, I do not consider that the proposed development would fall within the category of leisure and entertainment uses cited in PPG6, and in my view the relevance of that document is limited."

4.52 Other Inspectors were more sceptical of the scale issue. "the sequential test could always be thwarted by proposing development of such a scale that it could rarely, if ever, be housed in or on the edge of a centre" (see endnote 45). At Digby, Exeter (see endnote 46), the Inspector could see no good reason why an area of unspecified leisure uses should be regarded as an integrated leisure park.

4.53 Locational definitions used in Revised PPG6 have caused some problems. At Oxpens Road, Oxford (see endnote 47), the Inspector found arguments for designating it as either town centre or edge-of-centre but the SoS considered it to be out-of-centre because of the distance (800m) from the heart of the city centre and the difficult pedestrian route. (Revised PPG6, when talking of retail development, refers to 2-300m "of the primary shopping area" but "for other uses, such as leisure, edge-of-centre may be more extensive, based on how far people would be prepared to walk. For offices, this is likely to be in the region of 500 metres of public transport exchange").

4.54 In some cases, the distinction between out-of-centre and district centre sites is not straightforward. For example, in one night-club appeal (see endnote 48), the Inspector was of the opinion that although the Council did not recognise the retail park as a district centre it had many of the characteristics of such and cited the presence of opticians, travel agents and cash machines. However, at Backworth in North Tyneside (see endnote 49), the Inspector and the SoS accepted arguments that the site would be part of a proposed new district centre that
could be regarded as part of the edge of the future urban area.

4.55 The impression given by the decision letters was that, prior to planning applications being submitted, local authorities had undertaken little assessment of need for commercial leisure facilities, apart from those that were sports related. Where authorities had identified sites in local plans for leisure development (see endnote 50), it was unclear whether this was based upon analysis. In some decisions, it was apparent that the appellants marshalled convincing evidence of need (see endnote 51) whilst in others they failed (see endnote 52).

4.56 Only one decision letter (see endnote 53) mentioned that the appellant had conducted a leisure impact study - it resulted in a smaller scheme than that originally proposed. In a few cases, it was clear that local authorities had conducted their own research through analysis and/or surveys (see endnote 54). One Inspector (see endnote 55), commented that, although the applicants and the LPA agreed on the requirement for the proposed facilities, it was difficult to substantiate an absolute need for them. Another Inspector (see endnote 56), commenting on the evidence presented at the appeal, remarked "In my view, the nature of the analyses undertaken is rudimentary, and the series of assumptions made are largely determinative of the final outcomes".

4.57 The issue of the appropriate area of search for viable and available sites has arisen in several recent appeals relating to retail and leisure developments. In one case (see endnote 57), the Inspector said that for sites to be considered as available they must serve the same catchment area as the appeal proposal. "It cannot be the intention of PPG6 that people should have to travel relatively long distances to facilities in other towns, just because those facilities are centrally located, rather than be able to use facilities in their own town which, in the absence of town centre sites, have to be placed out-of-centre."

4.58 This issue is clearly closely linked to ensuring that developments were appropriate to the scale of the town. Consideration of alternative sites seems to have varied between fairly perfunctory (see endnote 58) to detailed (see endnote 59). Reasons for rejecting sites included

- unavailability within a reasonable period ie 2-2½ years from commencement of CPO proceedings (see endnote 60);
- not on the market;
- proximity to housing;
- insufficient parking;
- major remedial works required or internal layout unsuitable; and
- recent retail planning permissions seen as committing sites in the same way as allocation in the local and structure plans and the structure plan review (see endnote 61).

**Regeneration and employment**

4.59 The regenerative benefits of schemes appear to have been argued in only a
comparatively small number (see endnote 62) of appeals. In two cases, the regeneration impact was one of the grounds for allowing the appeal but four dismissals included the negative impact upon the future vitality and viability/regeneration of a nearby town centre (see endnote 63). In a case in the North East (see endnote 64), the Inspector pointed out the clash between the immediate need to regenerate East Durham following the closure of the coalfields and the long-term goals of sustainability and strengthening local town centres. The SoS stated that on this occasion "the primary considerations are the exceptional economic and social characteristics. the consistency of the proposal with the Governments commitment to the regeneration of the coalfields which constituted very special circumstances that justified the granting of planning permission".

4.60 Several appeal sites had been allocated for employment use and arguments were made at the appeals over whether leisure should be permitted. In the majority of cases, the Inspector was persuaded by analysis showing sufficient land had been allocated for employment uses during the plan period and also recognised that the unskilled jobs created would be beneficial to the area. In one case (see endnote 65), however, the Inspector concluded that although the supply of land exceeded the Structure Plan requirements, the land should be retained for employment uses. "In my opinion the employment land requirements set down in the Structure Plan are not targets for development in the sense that they have been based on precise calculations of employment needs. Indeed, it seems to me that for employment purposes the Structure Plan is seeking to provide sufficient land to ensure that a wide range of sites is available to employers, in the interests of providing every opportunity for job creation."

The development plan

4.61 Generally, appeal decisions take a pragmatic attitude to the Development Plan; leisure may not be identified as a use but can be viewed as acceptable in many cases. The Southall drive-through (see endnote 66) was not one of the preferred uses for the site but nevertheless was considered appropriate. However, the Exeter case was dismissed on the basis of the Local Plan.

Summary of key issues

4.62 National planning policy aims to secure a degree of consistency between local authorities plans and decisions. A key issue is therefore whether planning decisions are consistent and comprehensive in their consideration of planning policy guidance, and whether there are areas of inconsistency that suggest the need for clarification.

4.63 Survey data of planning applications and appeals suggest differing practices. This highlights the question of what background evidence should reasonably be required to support leisure planning applications, and uncertainty about what weight to attach to different factors. For example, for different forms of leisure development, what are the best ways of establishing and evaluating the economic benefits, accessibility and the impact on town centre vitality and viability?

Endnotes
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10. See Appendix V.
11. eg Bishops Stortford, granted 8.97 where the SoS disagreed with the Inspector over the contribution that the new football stadium would make to the coalescence of the town with developments to the east but considered that the unavailability of suitable alternative sites, the limited impact on the appearance of the proposed Green Belt and accessibility by a choice of transport modes were sufficient to outweigh the harm caused by the inappropriateness of the development and the coalescence.
12. eg Oxford, refused 10.98 where the Inspector recommended refusal on the grounds of visual impact and design. The SoS agreed with these reasons but added the failure to accord with PPG6 and 13 on location and accessibility by a choice of means of transport. See para 4.53
13. Eastleigh refused 2.97; Northam dismissed 6.97; Sunderland refused 6.98; Luton refused 8.98; Murton granted 1.00
14. Sunderland where permission had been granted for a multiplex on an in-town site (para 4.44 below) and Luton Kohlerdome where changes in transport spending meant that improvements to the M1, regarded as essential by the Inspector, would no longer take place.
15. eg Chester allowed 7.97
16. Peterborough dismissed 10.97, Colchester dismissed 7.98
17. Southall Ealing allowed 3.98; Seven Kings/Redbridge allowed 2.00
18. a drive-through restaurant on a retail park, Hove allowed 2.99
20. Handforth, Macclesfield dismissed 11.98
21. Clifton Moor, Ryedale allowed 1.97; Chester allowed 1.97
22. Peterborough
23. Lichfield dismissed on green belt issue 2.97
24. Newton Abbot allowed 3.97; Wigston allowed 5.97; Harlow allowed 9.99; Seven Kings, Redbridge
25. Oadby & Wigston; Seven Kings
26. Ipswich dismissed 7.96
27. Ryedale
29. Wigan
30. Bolton allowed 6.96; Mansfield granted 9.97; Luton, Wyncote dismissed 8.98
31. Peterborough refused 11.97; St Helens refused 11.97; Broxbourne refused 7.98; Cambridge refused 11.98; Murton
32. Kingston-upon-Thames refused 6.96
33. Digby, Exeter
34. Exeter dismissed 7.98; Newcastle upon Tyne allowed 1.99
35. Hull allowed 8.99; Gloucester outline appeal allowed, detailed dismissed on visual grounds 2.00
36. Chester; Lichfield; Newcastle upon Tyne allowed 1.99; Backworth, North Tyneside granted 2.99
37. Oxford
38. Colchester; Rotherham; Sunderland recommendation to allow by the Inspector but refused by SoS 6.98
39. Peterborough
40. Macclesfield
41. Abingdon refused 5.99
42. Eastleigh recommendation to allow by the Inspector, refused by SoS 2.97
43. Burntwood, Lichfield allowed 2.98
44. Bromley dismissed 3.97
45. Rotherham refused 9.98
46. Tesco appeal refused 4.97
47. refused 10.98
48. Ryedale
49. North Tyneside
50. Colchester; Kingston-upon-Thames; Lichfield; Oxford; Bristol
51. Oxford, refused for other reasons
52. Colchester; Rotherham
53. Lichfield
54. Colchester
55. Eastleigh
56. Rotherham
57. Macclesfield
58. North Herts allowed 2.98
59. Oadby and Wigston and Lichfield
60. at Oadby and Wigston
61. Lichfield
62. Bolton, Ipswich, Digby Exeter, St Helens, Lichfield, Rotherham, Sunderland, Murton, Gloucester
63. Ipswich, Digby Exeter, Rotherham
64. a mixed leisure, retail and B1, B2, B8 scheme at Murton, recommended for refusal by the Inspector but allowed by the SoS, 1.00
65. Exeter
66. Southall, allowed 3.98
5. Planning For Leisure: Public/Private Sector Perspectives

Introduction

5.1 This chapter considers a range of specific issues raised by the public and private sectors in relation to planning for leisure. They have been gathered from the LPA survey, a survey of private sector developers and operators, the wider consultation and the literature review. It then identifies those issues that relate to the application and interpretation of planning guidance.

An overview from the public sector

5.2 The survey of LPAs revealed that planning for leisure was of increasing concern. Over three quarters of respondents reported that they are facing major planning problems with leisure development. These problems are considered below.

Figure 5.1: % of LPAs reporting problems with leisure development - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

A lack of suitable sites

5.3 The most commonly cited problem was the lack of suitable sites for large-scale leisure development; nearly half (44%) of respondents reported this as a major problem. This was most frequently cited as a problem by urban authorities and areas where development pressures are highest. Over 60% of London Boroughs and almost half of the authorities in the South East and East Midlands reported this as a problem. In contrast less than 15% of authorities in Yorkshire and Humberside, East Anglia and the Northern Region reported this as a problem. Only a quarter of metropolitan authorities cited a lack of sites as a major problem.

5.4 In some areas, it was a lack of development interest rather than a lack of sites that was seen as a major problem. The difficulty of promoting sites was considered a major planning problem by approximately 20% of Metropolitan Boroughs.

The inadequacy of policies

5.5 The inadequacy of policies was the second most frequently reported problem in dealing with leisure developments. It was mentioned by 18% of respondents. In response to a separate question, however, an even larger proportion of all respondents (43%) expressed a desire for additional advice in PPGs. This desire was most pronounced amongst metropolitan authorities; 60% wanted extra advice.

5.6 Almost a quarter of authorities specifically wanted clarification of the advice in PPG6 relating to one or more of the following issues:

- the sequential approach;
the assessment of need;
the appropriate scale of development; or
the assessment of cumulative impact.

Several authorities wanted clarification of the implications of PPG13 for leisure developments.

5.7 Just over 10% of respondents thought there was a need for a new PPG for leisure (25% of Metropolitan authorities). Several authorities stated that PPG17 was out-of-date or covered leisure uses inadequately ie did not cover commercial leisure. Authorities had expressed similar views about the inadequacy of the coverage of large-scale mixed leisure developments in the recent research on the effectiveness of PPG17 (see endnote 67).

5.8 In consultations, some authorities expressed concern that national policy is subjugating local policies that may have been adopted to meet specific local requirements eg urban regeneration priorities or rural needs fulfilment as suggested in PPG1 (para 46).

A lack of resources

5.9 A lack of resources for adequate, additional research on leisure and the planning implications was considered a major problem by 29% of respondents. Over 25% of authorities in all categories reported this to be a major problem.

Impacts

5.10 In impact terms, traffic/parking was the most significant issue raised as a concern in relation to the examples of major applications submitted by the LPAs in the survey (Table 3.4). Again, proportions were higher amongst larger non-metropolitan cities and London Boroughs. Significantly, traffic issues were noted as problems by even more respondents in relation to smaller leisure and A3 developments.

Smaller leisure uses and A3

5.11 Over 80% of respondents stated that they were experiencing problems in dealing with smaller leisure uses and A3 developments. Amongst these authorities, the most frequently reported problems were:

• the (cumulative) effect on residential amenity including noise, litter, late hours, smells, bad behaviour etc (75%), particularly in urban areas;
• loss of A1 (50%);
• parking and traffic generation (30%), particularly in rural areas;
• impact on the character of the area (15%); and
• crime and anti-social behaviour (<10%).
5.12 Other, ad hoc issues raised were:

- the scale of some new A3 concepts eg the super pubs;
- conglomeration of A3 uses in historic towns and elsewhere;
- the over-representation of bars for young people;
- the unavailability of late night transport;
- the impact of change of use to A3 on the fabric of buildings;
- loss of traditional pubs as community facilities;
- the inherent unsustainability of drive-through restaurants predicated on private transport access; and
- the application of the sequential test to A3 uses.

5.13 There is also a general concern that some of the traditional planning control responses are not effective eg specified proportions of non A1 uses in a shopping frontage, traditional parking standards, planning conditions.

5.14 A survey of London Boroughs undertaken by LPAC in 1997 (see endnote 68) supports these findings; 64% of Boroughs stated that they were experiencing serious problems with the A3 Use Class and a further 30% have some concerns about its operation. The most common complaint raised by London Boroughs in the LPAC survey was the recent proliferation or concentration of A3 uses in town centres. Many of the other concerns raised in the LPA survey were raised also in the LPAC survey.

The Use Classes Order

5.15 A considerable number of authorities stated that they had encountered problems with the application of Class A3 and, to a lesser extent, Class D2 of the Use Classes Order. Such concerns were more prevalent in urban areas ie in two-thirds of London authorities, half of other metropolitan authorities and over half of the larger urban authorities. In contrast, only 10% of rural authorities reported encountering problems. Very few expressed any concerns about Class D1.

5.16 The main problems with the A3 Class in the survey related to the definition of uses and the inability to control changes of activity within the Use Class, many of which have very different impacts. In particular:

- the breadth of the Class that allowed changes between activities that are fundamentally different in terms of amenity, traffic impact and character eg tea rooms, restaurants,
bars/pubs, take-aways, drive-throughs;

- the problem with ancillary uses eg when does a bar with entertainment become a D2 use;
- the distinction between A1 sandwich bars and A3 restaurants eg when does hot food become the primary use;
- the use of out-dated terminology eg dance halls which can lead to ambiguity; and
- difficulties in imposing reasonable and enforceable conditions on new A3 units to prevent inappropriate changes.

5.17 By way of example, one LPA stated that the character of a centre had changed and problems of amenity, crime and disorder increased as a result of changes between different uses within Class A3. Another expressed concerns about the loss of pubs - defined as community uses - to restaurants and the amenity impact of changes from restaurants to take-aways.

5.18 Although only 14% of all responding authorities stated that they had encountered problems with Class D2, more than a third of London Boroughs, Metropolitan Boroughs and the larger city authorities stated that they had experienced problems. The main concern was similar to that expressed in relation to the A3 Class. The wide range of uses covered by the Class meant that there was a lack of control over changes between D2 uses with very different characteristics and impacts eg levels of activity, traffic impact and impact on amenity. Concerns were raised, also, about the inability to prevent the loss of uses such as leisure centres to uses such as cinemas or bingo.

5.19 Problems of definition were raised in relation to D2 as well, in particular in relation to clubs. Particular concerns were raised about the differences between social and night-clubs and the blurring of the distinction between some pubs and clubs. Difficulties of definition were raised also about the difficulty of determining whether an activity was ancillary.

5.20 Only four London Boroughs in the LPAC survey had reported experiencing problems with changes of use within the D2 Use. However, some cases were reported in which issues arose over the definition and breadth of the Use Class and 60% of Boroughs expressed the need to review the Use Class largely for these reasons.

5.21 Some of the changes are subject to licensing control and references were made to measures designed to improve co-ordination between licensing and planning authorities. Nevertheless, even in those authorities that had improved co-ordination, concerns were still expressed about the Use Classes Order.

An overview from the private sector

5.22 The survey of the private sector showed that site/premises availability was the most constraining factor on business development. Speed of obtaining planning permission (and decisions on call-ins) was second most important, followed by planning policy. These factors are more constraining than the availability or cost of finance. Put simply, in a very strong
market, the main constraints to development are the difficulty of finding sites and obtaining planning permission. Many projects are dropped rather than suffer the inherent delays. The follow up survey in Spring 2000 confirmed these findings.

**Town centre policy emphasis**

5.23 Current planning policy is firmly focused on ensuring that leisure development, like retail development, occurs in town centres to bolster vitality and viability and where there is accessibility by all forms of transport. PPG6 also states that where this is not possible, such developments should be encouraged to locate on sites which are, or will as part of the development, be made highly accessible by public transport.

5.24 Some in the private sector have interpreted this guidance to mean that "the larger cinemas cannot normally be placed within city and town centres and that clearly they do need to be very accessible, visible and have good car parking as well as public transport links" (see endnote 69). This interpretation was at odds with the Eastleigh decision where it was argued that small town centre sites should have been considered which might have accommodated smaller cinemas. In clarification, it has been stated (see endnote 70) that all the guidance in PPG6 applies to multi-screen cinemas. "The reference to multi-screen cinemas of up to six screens in para 2.22 is intended as an example, reflecting what is likely to be the reality of many town centre cinema developments. However, proposals for larger cinemas may be suitable for particular town centres, and these are entirely in line with the policy in PPG6."

5.25 Following the Eastleigh decision, however, there seems to be a growing realisation in the private sector that out-of-centre schemes are unlikely to receive permission and some developers are now concentrating on town centre sites. Leisure developers should stop "banging their heads against the brick wall of planning policy" and accept that the signposts point to higher quality, mixed-use schemes in town centres. "Were not looking for out-of-town sites now, because we know well just get knocked back." (see endnote 71)

**Town centre site requirements**

5.26 Both the private sector and LPAs report a lack of appropriate sites but some multi-leisure and mixed-use schemes are being developed in town centres. The private sector survey and interviews with developers/ investors revealed that developers were quite prepared to consider town centre sites. There is evidence that town centre and edge-of-centre sites can be made to work for innovative developers with good sites, good parking arrangements and a lively, attractive environment eg Luton, Maidstone, Bexleyheath.

5.27 However, it is their view that such developments still need adequate parking because in almost all areas public transport is very poor and most unlikely to improve significantly, particularly at night, so car or taxi as the preferred mode is inevitable. (Central London is the exception.) This is the dilemma with PPG6. The transplanting of an out-of-town concept with sufficient car parking may contribute to the vitality and viability of a town centre and offer a choice of means of access but does not necessarily contribute to the objectives of reducing private vehicle trips. Customers have a strong preference for using their cars, particularly at night, due to their convenience and the inadequacies of public transport. (Some operators
claim that people will travel further to find a leisure facility where they can park easily.)

5.28 Town centre sites also offer the distinct advantage of greater daytime usage and the potential for shared parking facilities. (Indeed, it has been reported that, for some operators, the only advantage of an out-of-town location is lower land value/rents and UBR. Many are forced to take space on such sites just to retain market share.)

5.29 The private sector still perceive problems with town centre locations for major leisure developments:

- viability. Town centre sites are smaller and more expensive to acquire and develop. Developers have to build vertically which increases costs and can reduce flexibility from an investment point of view;
- accessibility. Smaller sites mean adjacent car parking is difficult or impossible to provide;
- amenity problems are highlighted in town centres (PPG6, para 2.21) which can also lead to overlapping problems with the licensing authorities;
- design constraints in more sensitive town centres. PPG6 refers to the need for design to reflect local surroundings. It is not easy to disguise a large leisure box. In practice, this has not been a major issue;
- security is perceived to be worse in town centres; and
- the threat of out-of-centre proposals being permitted subsequently.

5.30 From the developers point of view, town centre schemes work well when there is only the market for one scheme ie where there is no chance of a competing out-of-centre scheme. It is more difficult in larger towns when there is always the threat of another scheme coming along eg Luton, Croydon, Wolverhampton.

**Multi-leisure sites and the synergy of leisure uses**

5.31 The private sector commercial leisure survey undertaken for this research showed that 50% of operators see the size of individual buildings, and the scale of each development, increasing with about 30% considering that they will stay the same and only about 20% thinking that they will become smaller. A clear majority (70%) consider that there will be a greater clustering of leisure uses in town centres, but respondents were equally split over whether there would be a larger mixture of leisure uses within developments (47% thought there would be a larger mixture and 41% thought the mixture would stay the same). The survey also endorsed the view that there will be considerably more emphasis in the future on a mixture of retail and leisure uses within developments (79% of respondents). Para 2.22 in PPG6 implies that out-of-town sites may be possible/necessary for large schemes (individual or multi-use) but the private sectors experience of call-ins suggests to them that large schemes are generally unacceptable.

5.32 Discussion about the scale of development focuses on the relevance of economic and
operational issues (synergy) in large multi-leisure developments. It is claimed by some developers that there is a natural synergy between different leisure uses eg a group will visit a multiplex, have something to eat, go to the pub and end up at the night-club or bowling alley all within the same scheme (see endnote 72). Thus a mix of different recreational activities at a leisure park is seen as being essential for a successful scheme, with apparent spin-off benefits to all concerned. It is also argued that large schemes can draw visitors into an area from a sub-regional catchment area with subsequent local economic benefits.

5.33 Other commentators dispute that a significant number of people visit more than one major facility and/or a restaurant in a leisure park on one visit. They claim that schemes are developed in relation to the size and form of site available rather than any particular operational synergy between uses. Indeed, different leisure elements have very different operational characteristics that sometimes conflict eg access and parking requirements, scale of units, noise generation etc. It is generally agreed that there is a synergy between catering (and perhaps speciality retailing) and cinema or one of the other major leisure activities eg bingo, bowling etc. However, it appears questionable whether users visit more than one anchor tenant on a leisure park (or in a town centre) on a single trip. This view was confirmed in terms of leisure parks by the visitor surveys carried out in the case studies (see Section 6).

5.34 Others argue that a different type of synergy exists, where familiarity with a site encourages repeat visits, perhaps to different activities at different times. It is alleged that, as time is a constraint, familiarity with the site and route to a leisure park will encourage frequent visits; that consumers prefer coming to the same destination each time for their leisure. In addition, a mix of facilities is necessary to create a concentrated buzz of activity or ambience that is so important for a successful leisure facility.

5.35 It has been argued by some consultees that this kind of synergy can be created in town centres as well as out-of-town/centre locations. The advantage of a multi-leisure park (and large individual units) is economy of scale in development, the opportunity to control the leisure environment and capitalise on customer demand for easy car access and plentiful free car parking.

5.36 There is limited documented evidence available. In the Mintel survey (see endnote 73), 42% "liked the idea of having a choice of entertainment all in one place" while only 13% "felt it (a multi-leisure park) would be a more safe/pleasant environment than my town/city centre for going out" and only 12% "wouldnt mind travelling some way to get there". Surprisingly, only 46% of respondents felt that "parking should be free" at a multi leisure park!

5.37 At the individual unit level, some, but not all, operators argue that multiplexes, for example, have to be big to meet customer needs for wider choice, longer runs etc. Others argue that megaplexes just exhaust the audience for each film that much quicker and profitability per head is diminished. However, it does seem clear that as multiplex saturation gets closer, scheme sizes are likely to reduce to target more local areas. Nevertheless, there is a view that eight screens are now the minimum for viable multiplex operation for most major operators.

5.38 At Eastleigh, the SoS rejected the commercial considerations of the cinema operator. He also did not accept that the other leisure uses needed to be associated with the cinema.
Smaller schemes

5.39 Companies were asked about the potential for leisure parks to be developed at a small-scale or dis-aggregated on separate sites. Most respondents thought that small town centre or edge-of-centre leisure parks were either generally, or in certain circumstances, feasible and only 12% thought it was rarely possible. The follow up survey confirmed these views, with slightly fewer respondents considering that it was rarely possible. Almost half of the respondents thought it was generally feasible for individual uses to be developed on separate sites in town centres, 30% thought it was in certain circumstances, and 24% thought it was rarely possible. As above, the follow up survey confirmed these views, with slightly fewer respondents considering that it was rarely possible.

5.40 Problems with small town centre leisure parks were found by 76% of respondents to be mainly due to marginal viability, followed by site constraints. Just over half of the respondents considered less appeal to visitors to be a problem. Design and difficulty over funding were regarded as the least problematic issues.

PPG6 and the sequential test

5.41 Overall, the questionnaire survey showed that the private sector responded positively to the sequential test element of PPG6. Three quarters of respondents were generally in support of it for a development scheme as a whole. However, fewer companies (42%) supported the sequential test for individual components of each scheme.

5.42 Just over half of respondents thought that the sequential test needed either modifying or clarifying with respect to schemes as a whole and the individual components of schemes. Qualitative responses and subsequent discussions with private sector representatives highlight particular points that need clarification:

- the role, definition and means of assessing need, particularly in the light of the Hambleton case (see endnote 74) and the subsequent Ministerial Statement of February 1999. Many operators and developers feel they do not understand the concept of need;
- whether the sequential test applies to ancillary or complementary uses within larger schemes eg restaurants on leisure parks;
- the concept of dis-aggregation and to what extent it applies to mixed-use schemes;
- the definition of availability, suitability and viability of sites;
- the definition of town centre, prime shopping centre, edge-of-centre etc;
- to what extent the sequential test is applicable to all leisure land-uses;
- the issue of scale of schemes referred to in the February 1999 Ministerial Statement and other Government statements. Is there still an inference that large developments are not acceptable in town centres (para 2.2)?
- parking in town centres; conflict between policies for modal shift versus old parking
standards; and

- the priority given to PPG advice over (older) adopted development plans.

5.43 The concept of market demand or capacity is well understood. The concept of need is much less well understood and there is confusion over the difference between capacity and need. Many people do not consider that there is a clear distinction between capacity and need. It also appears that there is a lack of consistency in how need is being interpreted. Clear guidelines as to the criteria which govern an assessment of need are sought by the private sector.

5.44 The concept of dis-aggregation is understood but there is uncertainty as to the extent that it should be applied to larger schemes. Should the sequential test be applied to all the components of mixed-use schemes or just the main components? Should dis-aggregation be applied to all mixed-use schemes whatever their size?

5.45 The availability, suitability and viability of sites is crucial when assessing alternative sites in the sequential test. There is confusion in the private sector as to what these terms mean and how they should be applied. In particular, the question of land ownership (where sites are in multiple ownership) and the possible timing of future availability are key concerns which require clarification/guidance.

5.46 A clearer definition of the town centre and the prime shopping area is sought, together with the relevance of these terms for leisure development. The appropriate distances for edge-of-centre leisure development, and whether these distances vary with different types of leisure development and for different sizes of towns, also requires clarification according to the private sector. A related point is whether the sequential test applies to all leisure developments, including health and fitness clubs, sports clubs (such as indoor tennis) etc.

5.47 Following reference to the appropriate scale of development in the February 1999 Ministerial Statement, clarification is required as to what exactly is meant by the term appropriate and how it should be assessed, particularly for large schemes which may have a regional or sub-regional significance.

5.48 Although most consultees were looking for clarity and certainty from a transparent planning system, there is also awareness that local flexibility is needed. PPG6 refers to the need to be flexible. "The guidance will need to be interpreted according to the different circumstances of each place." (para 1.12). There is a view that the sequential test is too inflexible, that it has become an end in itself and that other factors need to be taken into account. It was felt by many that it would be easier to deal with all these leisure related issues in an independent PPG.

The development plan process

5.49 Companies were asked about their experience with LPAs. Generally, they thought local authorities had a poor knowledge of the leisure market and development plans were considered poor at making adequate provision for new development. Most respondents considered there was a lack of relevant policies and to a lesser extent the policies were wrong.
In consultation, companies were concerned that in a fast moving sector, it is difficult to predict development requirements over a development plan period.

5.50 77% of respondents considered that, as a general rule, LPAs rarely work closely with the leisure industry in drawing up development plans, although 21% considered that they sometimes did. On the other hand, a large majority (79%) of private sector companies do not consistently monitor development plan preparations, make representations or generally engage in the development plan process, and 38% very rarely do so. However, 21% stated that they consistently do engage in the development plan process. Discussions suggest this lack of involvement is because planning time horizons are quite different between planning authorities and the private sector and some of the major players found their representations were given little weight. The private sector is, however, aware that representations are important to protect their position on appeal. There is perceived to be considerable room for improvement in the way LPAs work with the leisure industry, and vice versa, in drawing up development plans.

5.51 Companies were generally supportive of local authorities taking a more pro-active role in the leisure development process. 70% of respondents supported local authorities providing a strategy for the location of leisure uses, 65% supported local authorities allocating sites for leisure development, 77% supported local authorities assisting with site assembly and 73% favoured local authorities providing planning/development briefs for sites, but there were concerns about whether LPAs would allocate appropriate sites.

5.52 A large majority (91%) of respondents considered that market/capacity studies can be undertaken usefully, but 62% consider that they can be undertaken usefully sometimes rather than usually/always. In consultation, developers are concerned that such analyses are constrained by the difficulties of predicting future changes in the volatile leisure sector.

5.53 In terms of LPAs undertaking a market/capacity analysis to determine the level of provision needed as part of the development plan process, the answers were less clear cut. Only 50% of private sector companies supported it, 41% did not support it, and 9% were unsure about this. There is a concern that LPAs are not in a position to judge the changing, growing market. Respondents were also unsure as to whether numerical guidelines/standards could be used in the assessment of need, eg number of cinema screens per 1,000 population.

The development control process

5.54 Virtually all respondents discuss their development proposals with the LPA prior to submitting a formal planning application. The same number usually or sometimes prepare a case of need to support a planning application and 94% usually or sometimes undertake impact studies to accompany planning applications, but more than half only do so sometimes.

5.55 Planning obligations and parking standards, both mentioned by 55% of respondents, constitute the most frequently encountered problems with leisure planning applications. In consultation, it was the extent or size of the obligation, rather than the principle, that was the main concern. With parking, it was parking policies in town centres; modal shift versus old parking standards. Other problems with applications, in order of importance were:
residential amenity in town centres (52%);

- licensing in town centres (34%);

- signposting in town centres (27%);

- Use Classes Order (16%); and

- other problems which included competition from local authorities as landowners for alternative schemes/uses, percentage of open and public space, highways/transportation, adverts and design.

5.56 Licensing is an increasingly important element in the context of town centre management (PPG6 Annex C). The expense and time involved in clarifying the licensing situation (liquor and entertainment), the differing procedures and attitudes around the country and the overlap with planning regulations are all causing problems for the private sector. This has emerged as a major issue for the private sector - and for LPAs seeking to develop vitality in parts of the town centre.

5.57 In contrast to the public sector, 80% of the private sector respondents thought that a change in the Use Classes Order would not be helpful, referring specifically to the scale of development and/or the type of activity.

**Consistency in decisions**

5.58 Consistency in determining planning applications relates to consistency by individual local authorities, consistency between authorities in applying national guidance and consistency by Government in calling-in applications and determining applications. Inconsistency by planning authorities (and from the DETR) is a worrying issue for the private sector, although the questionnaire did not distinguish between the different types of consistency referred to above. Nearly half of respondents considered that, currently, few local authorities show consistency in decision making on leisure applications or it is rare for local authorities to show consistency. Only 10% considered that, currently, most local authorities show consistency in decision making or that local authorities are usually consistent. Overall, the general view was that there has been a slight worsening in the consistency of decision making over the last few years since PPG6 (revised) was issued. Quoted examples of inconsistency included:

- call-in of applications made on sites allocated in the UDP eg Dartford, Oxford;

- inconsistent call-in decisions eg Snowcentres at Wakefield and Wigan; and

- inconsistent application of policy within and between authorities. In Wakefield a town centre multiplex was given permission and developed but just before it was due to open, there was a resolution to grant planning permission for an out-of-centre scheme. The town centre cinema operator had been led to believe that such schemes would be refused (see endnote 75).
5.59 There is also concern that national policy is, in effect, being developed ad hoc by means of a series of appeal and court decisions (see endnote 76). In consultation, there were regular references to the view that it might be better to invest overseas with more predictable planning regimes. There is evidence of British companies investing overseas in leisure but it is unclear to what extent this is because of planning constraints in England.

5.60 A more general complaint by the private sector is that commercial leisure proposals are often regarded as second class forms of development, that planners have a poor understanding of the leisure market and consider that the leisure sector does not offer real jobs with real pay and career development (see endnote 77). Some local authorities are less negative towards leisure employment and recognise the potential for leisure development to assist in urban regeneration.

5.61 Delay associated with public inquiries is also a problem for the private sector. In a number of cases, schemes have been scrapped as a result of the expected delay and others have been substantially altered to comply with policy as a result of potential delay. It is considered by some of the developers interviewed that the complexity and timescale of the planning process has increased in recent years. This has increased costs so that in some cases the less (financially) attractive uses become unviable to pursue.

Co-ordination

5.62 In consultation, there is a concern about a lack of co-ordination between LPAs in relation to major leisure schemes that can have extensive catchment areas covering more than one local authority area. In some sub-regions there may only be the potential for one scheme. This may mean that an out-of-centre scheme is permitted pre-empting a town centre scheme in an adjoining local authority area, or more simply, the optimal location is not the one that receives planning permission. These situations are covered in a number of the case studies. A related point is the question of competing schemes in a limited market. This may be viewed as not the concern of planning but variable policy application can lead to unfair competition. For example, if developers are channelled into what is perceived to be a sub-optimal market location (town centre), they need assurance against a subsequent out-of-centre permission being granted by the same, or an adjoining authority.

Summary of key issues

5.63 PPG6 comes in for close scrutiny by public and private sectors alike. Its coverage of leisure development is perceived as lacking clarity, although the key messages from guidance, such as the emphasis on developing in town centres and on promoting transport choices, appear to be well understood. This prompts the question of whether existing guidance on leisure is sufficiently clear, and whether it needs to be presented separately.

5.64 The research raised the general issue of whether in all circumstances all leisure land uses should be subject to the policy and principles of PPG6. Particular issues related to whether:

- there is a functional relationship or synergy between leisure elements that could justify multi-use development;
• a special need for ancillary or enabling development could bypass the sequential test;
• larger developments could be justified by commercial pressures;
• policies need better to recognise the access and parking requirements of leisure development; and
• how economic development objectives and community leisure needs are balanced against other considerations.

5.65 The results of the interviews suggest areas where further guidance could be provided, or new approaches could be tried, for instance:

• how to assess need in leisure terms;
• planning for A3 uses so as to balance the development of the evening economy with amenity and other town centre uses;
• the role for (sub)regional planning of major leisure developments;
• what the nature and focus of planning obligations for leisure developments should be; and
• ensuring an adequate supply of sites for major leisure developments (in town centres).

5.66 As in the previous two chapters, this chapter has raised the question of how, in formulating leisure planning policy and development plans, a better appreciation of private sector priorities could be developed. The private sector seems uncertain as to its role in the process. There also seems a need to reconcile the private sector’s desires for both greater consistency and flexibility in policy application.

Endnotes
67. The Effectiveness of Planning Policy Guidance on Sport and Recreation, DETR/English Sports Council, 1997
68. A3 Use Class Survey, LPAC, January 1998
69. DTZ in EG focus Dec 1997, op cit
70. In a letter to Planning Week (26.9.96), William Chapman
72. Freedman in EG focus Dec 1997, op cit
73. Multi-leisure parks, op cit
74. The Queen v. Hambleton District Council ex-parte Somerfield Stores Ltd, High Court, November 1998. The Judge, the Hon Mr Justice Dyson stated, "I have reached the clear conclusion that PPG6 (i) does not require need for the development or enhancement of existing town centres to be shown as a condition of the grant of planning permission and (ii) does not render need and enhancement a material consideration in all cases."
75. Robertson, Planning 28 November 1997 and confirmed in the case study
76. Voiced strongly at a Leisure Property Forum meeting, May 1998 and by other consultees
77. Mackie, Property Week Leisure Supplement, March 1998
6. The Leisure Case Studies

6.1 As part of this research, eight case studies have been undertaken. This involved finding suitable locations where a number of the issues identified could be investigated in more detail on the ground.

Issues to explore

6.2 The issues drawn out in the preceding chapters were presented to, and approved by, the steering group under a number of headings:

- leisure trends; the issues related to the planning implications of current changes in the market, demographics, socio-economic groups and lifestyles, particularly the perceived trend towards more accessible leisure in its widest sense;

- leisure property trends; there are perceived difficulties in planning for what is often considered to be a volatile sector including the changing scale of developments, the different growth rates of different activities and the relative impact of planning policy encouraging town centre development;

- the interpretation of Planning Policy Guidance; the perceived need for clarification, consistency and further guidance on planning for leisure. Issues included:
  - assessing need or market demand;
  - clarifying definitions eg town centres, available sites;
  - planning for large and/or mixed-use leisure schemes;
  - planning for leisure in a sub-regional context;
  - parking policy in town centres and the travel needs of leisure users; and
    - the relative importance of economic development in planning terms.

- the impact of (different) leisure development on eg;
  - PPG13 accessibility priorities;
  - the vitality and viability of town centres; and
    - amenity in town centres ie problems associated with the control, and promotion of, A3 developments.

- the planning process; the need for LPAs to be co-operative and pro-active in policy preparation and the implementation of policy;
  - the efficacy of leisure planning policies in development plans;
  - the preparation of needs analyses and other background studies;
  - the involvement of the private sector in the planning process; and
    - the application of national planning guidance in development control.
Choosing the case studies

6.3 Not all these issues could be explored in the context of a case study. Case studies were used to focus on the planning process, planning impacts and A3 issues.

The planning process

6.4 Cases were required to cover pro-active planning for leisure development, application of PPG6 and the sequential test including:

- regional planning and competition issues;
- plan-led approaches; policies, SPG, needs assessments, site allocations, parking standards etc;
- urban regeneration sites in the context of PPG6; and
- decision making in the context of current planning guidance.

The planning impacts of leisure development

6.5 Out-of-centre leisure park cases were required to look at impacts on:

- vitality and viability of town centres;
- trip generation;
- accessibility; and
- consumer needs eg synergy between and within sites.

A3 issues

6.6 Cases were needed to look at:

- the promotion of vitality and viability and the evening economy; and
- controlling the cumulative impact of A3 developments in town centres.

6.7 A number of criteria were used to prepare a suitable list of case studies ie cases that
offered:

- a range of issues besides the key focus;
- a geographical spread with at least one in London;
- both large and small (rural) locations;
- the co-operation of LPA and developers/operators; and
- evidence of impacts.

6.8 The final selection was:

- the planning process; Norwich, Bicester/Banbury, Wakefield and Kettering;
- planning impacts (with user surveys): Dagenham/Barking/Beckton and Bristol; and

6.9 The case studies were presented to DETR as working papers, summaries are presented below. Details of the user surveys conducted in Bristol and Barking/Dagenham are presented in Appendix IV.

Case Study Summary: Planning For Leisure And Related Impacts In Bristol

Location and background

6.10 Bristol is a major city with a population of over half a million. It is the largest city in the South West region and, being close to the intersection of the M4 and M5 motorways, it has a large hinterland for retail and leisure activities. The former county of Avon, of which Bristol was at the heart, has a population of about one million.

6.11 Until the reorganisation that occurred in 1996, Bristol came under the jurisdiction of Bristol City Council (BCC) and Avon County Council. However, owing to the spread of the city east along the A4 and north towards the M4 and M5, part of the urban area was, effectively, in the neighbouring authorities of Northavon (to the north) and Kingswood (to the east). After reorganisation, Avon no longer existed and four unitary authorities were created from what were six district/borough councils. BCCs boundaries remained unaltered, but Northavon and Kingswood were merged into South Gloucestershire Council. In addition, Bristol Development Corporation (BDC) was designated in 1989. A swathe of central and east Bristol was, as a result of the designation, taken out of BCC’s control.

6.12 Bristol has been the subject of considerable commercial leisure development activity with four major schemes now completed (at Avonmeads, close to the city centre within the BDC area, at Hengrove Park in south Bristol, at Cribbs Causeway in North Bristol and at Kingswood
in east Bristol.) None of the four schemes are located in the city centre or in a district centre and none could be classified as even edge-of-centre. None of the four schemes are well served by public transport, but have large car parks and cater, primarily, for car-borne users. No major city centre commercial leisure schemes have been developed, but the large mixed-use Harbourside scheme, including a commercial leisure element, has been proposed for some years, but has yet to prove acceptable to the local planning authority and is proving to be very controversial. The developers, Crest Nicholson, were given, in early 2000, a 12 month extension to their preferred developer status to achieve full planning consent.

6.13 The relevant issues to be explored in this case study are:

- the planning process. Why were these leisure schemes permitted, apparently in contravention of the principles of PPG6 and PPG13?; and
- planning impacts. What effect have these schemes had on the vitality and viability of Bristol City centre? Would leisure schemes have come forward in the city centre if these out-of-centre schemes had not been permitted?

Key findings

The planning process

6.14 All four major commercial leisure schemes originated and received initial outline planning permission at almost exactly the same time in the early 1990s, although they were not developed at the same time. They pre-dated the latest version of PPG 6 and some schemes received outline planning permission just before the 1993 version of PPG 6. Three of the four schemes were promoted and developed on sites owned by the public sector, either local authorities or BDC.

6.15 The planning situation in the Bristol area is complicated. In the early 1990s there were four different planning authorities and each scheme was situated in a different planning authority. The situation has now changed.

6.16 At Avonmeads in central Bristol (but outside the city centre) where BDC owned the site, the BDC Committee report rejected objections from the County and BCC. It was considered that BDCs Development Strategy (May 1990) and the Central Area Development Framework (March 1991) supported a mixed development of retail and leisure uses. Furthermore, the development would generate nearly 600 full time equivalent jobs whereas there were no jobs on the site at the time and had not been for many years, as most of the site had been cleared and vacant for over 10 years. The site was considered to be a key regeneration site for the central part of the UDA.

6.17 At Hengrove (site owned by BCC), a number of issues were considered by BCC (September 1995). In terms of the principle of development and the mix of uses, officers considered that the Deposit Bristol Local Plan showed Hengrove Park as a major regeneration site. It was identified to provide a range of leisure and sports facilities to help provide a new focus of activity in South Bristol. Outline permission was granted for a similar scheme in
October 1993. All these factors supported the principle of development and mix of uses. Officers made a further justification. "Whilst the development of new bingo facilities and a cinema may have implications on existing operations, it is not the role of the planning process to arbitrate between competing operators". No mention was made of PPG6 or the location of competing facilities in town centres compared to Hengrove Park, which is clearly an out-of-centre location.

6.18 At Cribbs Causeway (site owned privately), the report of the officer to the Planning Committee (Nov 1993) stated that the site was allocated for employment purposes in the Local Plan but conceded that the proposal could not be classified as employment development as defined in the Local Plan. However, it "would not prejudice the District Councils employment objectives for the creation of a suitable number and range of employment opportunities". It was estimated that the proposal would create at least 245 jobs compared to 150 jobs if the site were to be developed for warehousing and there would be a greater variety of jobs. "Having regard to this and the fact that planning permission was granted by the Secretary of State for the Regional Shopping Centre on the adjoining land, subject to the same policy considerations, it is not considered that a policy objection could be raised to this proposal". Also relevant was the fact that the retail planning permission included a multiplex cinema.

6.19 At Kingswood (site owned by the District Council), the officers analysis of the proposed leisure scheme considered that the principle of the development had been established by an outline planning permission in September 1993 for a commercial leisure scheme with an adjacent public sports and leisure complex. However, officers also recognised that consideration had to be given to the change in policy background since 1993. Despite the recognition of changed national planning policy, the only specific reference to PPG6 and PPG13 in the report to Committee relates to accessibility by public transport. Impact issues or the sequential test were not mentioned.

6.20 None of the four out-of-centre schemes are well served by public transport. They all have large car parks and cater primarily for car-borne users.

Planning impacts in Bristol

6.21 The visitor survey undertaken at Hengrove Leisure Park showed that, although 55% of visitors lived in south Bristol fairly close to Hengrove, the remainder lived further away in other parts of Bristol or beyond. 84% of users came by car. This is a more concentrated catchment area than for the city centre and with a higher car usage. The majority of visitors made frequent visits to the leisure park, but nearly three quarters of visitors stated that they came to use only one of the facilities or one facility plus catering.

6.22 The majority of users of Hengrove Leisure Park previously visited the city centre or Avonmeads leisure park for leisure activities. However, this is not a straightforward diversion of use as 21% still used these facilities just as much and 46% continued to use them but less often. Over 40% of interviewees said that they now spent more time/money on leisure activities than they did before Hengrove Leisure Park opened.

6.23 A follow up question asked whether the facilities at Hengrove Park would still be used to the same extent if they were located in the city centre rather than at Hengrove. 55% said yes and 45% said no. Of those that answered yes, about half considered that they would use their
car to travel to the city centre and half said that they would use public transport.

6.24 No major commercial leisure schemes have been developed in the city centre in the period of time that the four out-of-centre schemes have been developed. Three major schemes were proposed in the late 1990’s but it was considered by the Council's consultants that, due to the number of (out-of-centre) schemes recently built in Bristol, there was only capacity to support one of the city centre proposals (Harbourside). However, some form of commercial leisure could still proceed on the other two sites, but no proposals have been forthcoming.

6.25 The commercial leisure market has expanded dramatically in the 1990s and this growth has supported the four out-of-centre schemes. As a result of this growth, and despite the out-of-centre developments, Bristol City centre appears healthy with a strong leisure market for A3 uses in particular. There has been very strong growth in the market and significant new developments.

6.26 If some or all of the out-of-centre developments had not occurred (and in particular the Avonmeads scheme), it is probable (according to BCC and English Partnerships) that additional commercial leisure developments would have been developed in the city centre.

6.27 There is some evidence (from Hengrove) that new developments can increase visitation rates for leisure uses, due to modern attractive facilities in convenient and accessible locations. This point, coupled with the general growth in incomes and leisure expenditure, means that the impact of new non-city centre leisure developments on the city centre has been ameliorated and the overall effect reduced. However, in the case of Bristol, the four out-of-centre developments appear to have reduced the amount of city centre development such that no multiplex cinema development has so far occurred, although one scheme has been planned for some time.

Further issues emerging from the case study

6.28 The four major leisure schemes developed in the latter half of the 1990s in the Bristol area have been on out-of-centre sites, despite three out of the four being publicly owned sites. Each scheme was in a different local authority area. Planning decisions in the early 1990s appear to have been made at the local level without consideration of the wider picture of the Bristol urban area. Even if some locally based commercial leisure schemes were desirable, they have been developed in out-of-centre locations. Where catchment areas are extensive and overlap the city centre, can local, non-town centre leisure developments be justified?

6.29 The main justification for two of the schemes was regeneration (Avonmeads and Hengrove Park). Cribbs Causeway was partly justified by employment generation that was considered to be greater than for traditional employment uses (the Local Plan allocated use). The fourth scheme (Kingswood) grew out of the originally perceived need for public sports/recreation facilities that were funded by the commercial leisure element of the scheme. Should an LPA be able to give precedence to local economic development priorities over general national planning guidance?

6.30 The decision to grant planning permission for all four schemes appears to have ignored consideration of the impact on the city centre and ignored consideration of the wider picture in terms of the provision of leisure facilities in the Bristol urban area. Trade has been diverted
from the city centre and no multiplex scheme has actually been developed there. Without the out-of-centre developments, it is probable that one or more city centre multiplex developments would have occurred. Is there a role for (sub)regional planning of major leisure developments?

**Case Study Summary: Planning For Leisure And Related Impacts In Barking, Dagenham And Beckton**

**Location and background**

6.31 The adjacent London Boroughs of Newham (LBN) and Barking & Dagenham (LBB&D) are located in east London on the north bank of the Thames. In 1994, two planning applications were submitted for leisure parks; one was beside a Council owned sports centre at Dagenham in LBB&D and the other at Jenkins Lane in Beckton, LBN.

6.32 These schemes, both of which included a multiplex cinema and restaurants, were sited 5-10 minutes drive from each other beside the A13, the main east to west road corridor in this part of the capital. Barking town centre, which included a multi-screen Odeon, was a mile from Jenkins Lane and some 3½ miles from the Dagenham site. There was considerable competition between the boroughs to secure a leisure park for their area.

6.33 Over the past three decades the economic, social and environmental fabric of both LBB&D and LBN have been irrevocably altered by the closure of the docks and their related activities and the decline in Londons industrial base. Consequently, regeneration is a prime concern for both authorities.

6.34 The relevant issues to be explored in this case are:

- regional planning; the development of two major out-of-centre leisure facilities in close proximity with no co-ordination between the two LPAs;
- impact on town centre vitality and viability; whether the two schemes had an adverse impact on nearby town centres;
- planning processes; the extent to which Government guidance influenced, or was ignored by, the LPAs because of other priorities; and
- accessibility by public transport; the extent to which this issue was considered.

**Key findings**

**Regional planning**

6.35 The strategic or regional impact of siting two large, similar leisure schemes within 5/10 minutes drive of each other was not addressed by the LPAs. The referral of applications to the London Planning Advisory Committee is voluntary and its views were only sought on the Jenkins Lane proposal. The SoSs call-in letter on Jenkins Lane raised the question of
alternative sites for that scheme but made no mention of the sub-regional context. The inspector continued this theme and specifically stated that he understood the applicants were not deterred from developing Jenkins Lane by the fact that the Dagenham development had begun.

6.36 At the time of writing, the Dagenham leisure park was still affected by improvement works to the A13 which hampered access to the site; parking and traffic congestion were cited as disadvantages in the user survey. Parking provision was also an ongoing issue but the Council expected that, when the road works were completed in the summer of 1999, joint car park use with the neighbouring Sports Centre would be easier. (It also hoped that improved access would encourage the synergy between the two facilities which was originally intended but had not yet occurred.)

6.37 Neither development appears to have fulfilled its anticipated promise. At Dagenham, the Hotshots night-club and bowl closed during December 1998 and audiences at the multiplex are below anticipated levels. The continued discounting of prices at the Jenkins Lane multiplex suggests that competition for customers is strong.

Planning impact; vitality and viability

6.38 The Barking Odeon closed in December 1998, whilst the case study was in preparation. The survey at Dagenham leisure park showed that just under a quarter of respondents had used the facilities in Barking town centre and 40% had used other town centres, prior to the park opening. Over half had ceased to use the location they previously visited and nearly a third went less frequently.

6.39 The Dagenham planning permission and LBNs agreement to the Jenkins Lane scheme were both granted in the context of the July 1993 PPG6. This advised that LPAs "should not refuse permission for development on the grounds of the effect on a town centre unless there is clear evidence to suggest that the result would undermine the vitality and viability of that centre which would otherwise continue to serve the community well".

6.40 Vitality and viability were defined as depending "on more than retailing; they stem from the range and quality of activities in town centres, and their accessibility to people living and working in the area"...."Variety and activity are essential elements of the vitality and viability of town centres. In exercising their planning powers, local authorities should therefore encourage diversification of uses .. Entertainment facilities . can add variety".

6.41 When considering Barking town centre, the Inspector at the Jenkins Lane Inquiry concentrated upon evidence that the retail and leisure functions had little influence on each other and ignored the issues of maintaining variety in the town centre.

6.42 The user surveys carried out in Barking town centre and at Dagenham Leisure Park found some interaction between the leisure and retail functions of the town centre. Just over half (51%) of interviewees in the town centre said they would undertake activities additional to the main purpose of their visit. The most popular were shopping (28%), using the bars/pubs (19%) and restaurants (14%) and going to the cinema (16%). The bar/pub and restaurant goers were the most active users of other facilities, followed by the shoppers and then the cinema audience. The evidence suggests that the town centre retains some vitality through its licensed
premises but has clearly lost diversity through the closure of the cinema.

6.43 It seems clear that the closure of the Odeon was directly related to the opening of the two leisure parks (and this is a view held by the cinemas management). Warners at Dagenham opened first and had some impact on the Odeon but admissions dropped 81% after the two multiplexes opened. This was attributed to a combination of factors:

- the quality of facilities (air conditioning, wide screens, sound, choice of films, frequency of film showing, car parking) at the multiplexes;
- the inability to compete by differentiating its offering. The distribution system locked it into showing specific films at set times, regardless of whether they were appropriate to the potential local audience; and
- lack of nearby evening car parking.

6.44 Problems of reducing turnover resulting from falling audiences were compounded by the Jenkins Lane Showcases policy of offering discounts through local papers. This forced Warners and then Odeon to bring down their ticket prices to comparable levels. New carpets, seating and technical equipment were installed in the Odeon in June 1998 but with little impact on either audience figures or income.

6.45 To set against this, Rank have been threatening to close the cinema for over a decade and some years ago had won a change of use to bingo on appeal but had never implemented the permission.

The planning process

6.46 Although prior to the revision of PPG6, neither authority had undertaken any research into the need/demand for leisure facilities in the area and impact studies were not required for the planning applications. Combined with the regional policy vacuum, this left the planning authorities reliant on the information provided by developers and their own knowledge of the area. The fact that the leisure industry was rapidly growing and changing made up to date assessment problematic for all parties.

6.47 Regeneration was, and is, the overriding concern in this part of East London. There were also policy references to leisure. Nevertheless, the notion of regeneration through leisure seems to have been accepted at Jenkins Lane with little analysis to back it up. At the Inquiry no one questioned whether a rival multiplex down the road might reduce the regenerating capacity of Showcases proposal.

6.48 Perhaps the fundamental issue was the Inspectors conclusion that regeneration outweighed the issues in national planning guidance. This clearly has far-reaching effects.

6.49 The importance of a gateway site with a high profile design was emphasised at both sites but was subject to little analysis and proved difficult to implement. (Commercial leisure was considered appropriate for these gateways.) However, Jenkins Lane is tucked below the A13 and is hardly a gateway. The Dagenham development presents its car park to the A13 so its
visual impact as a gateway is reduced.

**Accessibility**

6.50 In both cases, there was considerable concern expressed about the traffic and accessibility issues. The LBB&D UDP supported leisure developments that were well served by public transport and located in or adjacent to town centres and the LBN committee report recognised that “the proposed development in strict terms contradicts the aims of PPG13”, but argued that this had to be balanced against the (economic development) benefits.

6.51 Although some facilities for public transport were included, both developments provide large amounts of car parking and the great majority of visitors are expected to arrive by car. The Dagenham visitor survey showed only 6% of respondents arriving by public transport. As yet, LBN has no data on the use of the buses that have been diverted into Jenkins Lane and were intended to improve services for the southern part of the Borough. The trams, for which land was set aside on both sites, are still un-programmed.

**Further issues emerging from the case study**

6.52 Regeneration is an important objective for many authorities and competition for development can have considerable impact upon planning decisions. Given concerns about the location of both leisure park developments and the potential impact upon local town centres, the doubling of this impact warranted wider consideration.

6.53 Similarly, since both schemes were out-of-centre, their poor commercial performance might be perceived simply as a clear case of competition at work, and thus not a planning issue. However, given both sites were promoted as gateway sites with economic regeneration priorities for a wider area, economic sustainability might have been considered a pertinent planning issue. Is there a role for (sub)regional planning of major leisure developments?

6.54 Changes in the usage and commercial success of town centres are complex and multi-causal, and thus difficult to assess. However, it seems clear that the out-of-centre developments did damage Barking town centre directly; the cinema has closed and there is evidence of users having left Barking and other town centres. The out-of-centre developments may also have had indirect effects affecting the commercial incentive for leisure development in the town centre and reducing diversity in the town centre. Can the contribution of leisure to the vitality and viability of town centres be defined and the impact of leisure development be assessed realistically?

6.55 Despite consideration of public transport issues, the permissions granted suggest priority was given to economic development over the principles of sustainability now inherent in PPG6 and PPG13 by the LPAs and, in the case of Newham, by the Inspector and SoS. Should an LPA be able to give precedence to local economic development priorities over general national planning guidance?

**Case Study Summary: Leisure And The Planning Process In Norwich**
Location and background

6.56 Norwich is the county town of Norfolk and identified as the regional recreation centre in the Structure Plan. There is no competing centre within a 40 minute drivetime. The catchment population is estimated to be around 620,000.

6.57 In the mid 1990s, the city had three traditional cinemas with a total of 8 screens and 2,222 seats. In 1994/95, applications were made for multiplex cinema developments at two out-of-centre locations in two adjoining local authorities. One was called-in and subsequently withdrawn. At the other, Broadland DC included the proposals in the draft local plan for various commercial leisure facilities.

6.58 Norwich City Council (NCC) and the county were committed to maintaining the vitality and viability of Norwich town centre where potential development sites were available. This stance was supported by existing policy though leisure was rarely mentioned specifically.

6.59 NCC successfully opposed the Broadland proposals at the Inquiry. It carried out innovative surveys of town centre cinemas to estimate the town centre spending generated by cinema attendance. This information was used to support the case against out-of-centre multiplexes. The Inspector concluded:

- the proposal was a sub-regional facility;
- there were a number of sites in Norwich town centre which could accommodate this type of leisure development;
- there was no strong planning argument for accommodating all uses on one site; and
- it was generally agreed that only one multiplex was viable in Norwich.

6.60 Subsequently, in 1996 and 1997, there were proposals for multiplex developments on five sites in or near the town centre. Four were submitted as applications:

- Riverside; a mixed-use scheme next to the station including a 14 screen multiplex. The site has always been seen as a key redevelopment site to expand the city centre although it is on the other side of the river. The ring road realignment to enclose the site now reinforces its town centre status;
- Castle Mall; an 8 screen multiplex within the shopping centre car park. This site is in the heart of the city;
- Nestles; a mixed leisure scheme including an 8 screen multiplex. The site borders, but is within, the ring road so considered town centre;
- The bus station and TA depot; a 9 screen multiplex and other leisure. Like Nestles, it borders but is within, the ring road; and
- ECN; an existing large office block with redevelopment proposals for a 13 screen
multiplex. No formal application lodged.

6.61 The Structure Plan and RPG were outdated in terms of relevant leisure policy. The Local Plan had little relevant detail on leisure policy, though protecting and expanding Norwich centre and developing regeneration sites were identified as strategic priorities. NCC had an adopted Leisure Plan covering commercial and non-commercial leisure and identified development priorities including a multi-purpose leisure complex. NCC had to rely on these policies, PPG6 and policy specifically devised by NCC in order to respond to this demand for multiplex sites.

6.62 The result is that Norwich has secured two multiplex developments within the city centre in locations that meet NCCs planning objectives. The Riverside site opened in December 1999 with a multiplex, bowling centre, night-club and A3 uses. The Castle Mall multiplex opened in Spring 2000. In October 2000, the older traditional cinemas remained open.

6.63 The relevant issues to be explored in this case are:

- need and capacity; a pro-active approach used to:

  o successfully oppose out-of-centre multiplex proposals based on an assessment of impact, and, the argument that town centre sites were available; and
  
  o determine need for multiplexes alongside the development of criteria for choosing preferred sites and schemes.

- town centre definition. The case study also raises issues about the definition, and relationship of, town centre, edge-of-centre and out-of-town sites in relation to the sequential test; and

- accessibility to leisure facilities by a choice of modes.

**Key findings**

**Need and capacity; a pro-active approach**

6.64 After the out-of-centre proposals were refused, there were more (five) town centre proposals than even the most optimistic estimate of capacity would support. Town centre interest seems to have been promoted by out-of-centre refusals.
6.65 NCC took a plan-led approach, which sought to achieve development in line with the strategic initiatives identified in the local plan. A series of criteria were developed to test whether proposals met strategic and other policy priorities eg accessibility, townscape, regeneration etc and preferred locations were identified as a result. NCC concluded that the only site which met all the criteria was Riverside, which should be the preferred location, and that additional proposals would need to demonstrate that they met a demand not served by Riverside and that they would comply with the established criteria.

6.66 Subsequently, the other proposals were tested against the same criteria and whether or not there would be sufficient demand on the assumption that Riverside would go ahead. The possibility of granting permission to all proposals which met the NCC criteria and letting the market decide, given that they were all town centre sites, was rejected since:

- the market would not necessarily find the best site(s) in planning terms;
- "demonstrable harm to interests of acknowledged importance" might not be avoided; and
- the viability of the whole Riverside redevelopment might be undermined.

6.67 Capacity studies were used to estimate the potential demand for multiplexes. A report was commissioned from consultants (see endnote 78). The report argued that Cinema Impact Assessment (CIA) methodology was in its infancy and that the different methodologies provided widely varying results. (Predictably, all applicants found that a further multiplex was justified whilst UCI at Riverside found that it was not.) The report concluded there was no quantitative basis to justify another multiplex but there may be a qualitative case given Norwichs regional role, the number of students and visitors.

6.68 NCC decided to take this position as there was a concern that if all the applications were refused, developers could argue the absence of town centre sites to promote an out-of-centre permission which would be more damaging. Therefore, despite capacity concerns, it was decided to allow one more multiplex and NCC aimed:

- to restrict the number of permissions to that capacity ...."the case for a third multiplex ....Cannot be justified by any objective analysis"; and
- to identify the best sites in relation to broad strategic objectives.

The alternatives were assessed against the criteria and Castle Mall was given permission. The Nestle and bus station sites were refused.

6.69 Some developers regarded this as unreasonable, since views on the best sites within the town centre and of the potential market were varied. Provided the criteria were satisfied, they felt all sites should have been granted permission. Developers felt that NCC were determined to achieve the development of Riverside, and discouraged all other proposals until that was secured.

6.70 Following the NCC decisions on the respective sites, the two appeals have not been
pursued. Mixed-uses are now proposed on the Nestles site (retail, residential and hotel) and the bus station site is the subject of a public consultation exercise. The ECN site remains as offices. There have been no new applications for cinema use within or outside the centre.

Defining the town centre

6.71 Crucial definitions of what constitutes town centre, edge-of-centre, out-of-centre etc were not made clear. Two developers argued that Riverside is, in fact, an edge-of-centre site; it is across the river, outside the city wall and was outside the ring road until the ring road was shifted as part of the development. The site was previously used as a park and ride site with a bus to bring people into the town centre!

6.72 The developers argued that their sites, which were actually in the town centre, should have been preferred. NCC claimed that the bus station site was actually edge-of-centre (June 1997 report) which is, at the least, arguable.

6.73 NCC have argued that the town centre is made up of different quarters; retail, leisure, office etc that are not necessarily coincident with each other. Riverside is well related to the river, the football ground and is to be linked to King Street, which is the subject of speciality retailing and tourism development.

Accessibility

6.74 Both approved locations are town centre but have extensive on site parking (1834 Riverside, 900 existing spaces in Castle Mall). Although accessibility was one of the criteria set up by NCC, adequate car parking was sought to serve the development. Both sites are accessible by public transport, but do not require it. Riverside in particular can be seen as having many out-of-centre characteristics; plentiful parking, location on the ring road, a large integrated development with retail park and foodstore, both with extensive surface parking, layout etc all in an edge-of-centre or town centre location. The Riverside developer feels they "could not have done better in another [that is, out-of-centre] location" (though they wanted even more car parking spaces).

Further issues emerging from the case study

6.75 NCC have taken a pro-active, if controversial, approach to meet their planning objectives. It appears to have been effective, based on a well-informed understanding of the market. However, the situation may be atypical.

6.76 The disagreement was about trading off the sequential test with other policies. The developers argued that the sequential test should have been the single guiding principle and that proposals that satisfied its requirements should have been given permission subject to details. NCC applied the sequential test alongside their own policies from an approved local plan. The latter played a crucial role, especially in relation to the Riverside site where NCC were keen to see the town-centre breathing out and regeneration. Should LPAs seek to control development that has satisfied the sequential test?

6.77 This case study highlights the need to clarify the definition of town centre, edge-of-centre
and out-of-centre locations. It also focuses on the need for commonly-agreed means of need/capacity assessment for different leisure uses that can be prepared effectively and realistically.

6.78 The approved town centre locations are clearly accessible by public transport but they are also very accessible by car. Developers are prepared to locate in the town centre provided that adequate car parking is also available.

Case Study Summary: Leisure And The Planning Process In Wakefield

Location and background

6.79 Wakefield Metropolitan District Council (WMDC) is the 8th largest MDC in England with a population in excess of 300,000. The city forms the south east corner of an urban square made up of Bradford, Leeds, Wakefield and Huddersfield. With the good motorway network in the area, the catchment population within a 30 minute drivetime is estimated to be around three million residents.

6.80 There has been a dramatic restructuring of the local economy over the last 15 years with the rapid decline of coal mining and other traditional industries. There is serious economic disparity within the district. There is a political priority on regeneration and the replacement of jobs that is embodied in the UDP. "Regeneration is the underlying theme of the Plan and it influences to some degree all subsequent topic areas." (see endnote 79)

6.81 WMDC has traditionally relied upon public funding for regeneration initiatives but its European regional status has changed and the local authority has had to adapt to accommodate this fact. WMDC considers that it now needs to be pro-active in changing its image, to work with the private sector and, in particular, to look to the service sector. The pursuit of these local objectives has impacted upon a number of planning decisions for leisure schemes.

6.82 Wakefield has a new edge-of-centre leisure park (1996), including a multiplex cinema, bingo and three A3 units. This scheme was one of the earliest leisure schemes to be developed in a central, albeit edge-of-centre location. The contribution it would make to town centre diversification and modal choice was acknowledged by the LPA at the time of the application. However, the scheme is not a town centre scheme in the sense of PPG6 aspirations; it has extensive dedicated parking and is therefore unlikely to encourage modal change. This was not raised as an issue by the LPA.

6.83 In recent years, there have been applications for a number of new, major out-of-centre leisure developments including:

- Glasshoughton Snowdome with complementary leisure facilities adjacent to Junction 32 of the M62, 11km north east of Wakefield near Castleford (approved June, 1996). This 59ha contaminated colliery site had been vacant for some time, zoned in the UDP for industrial use "but may also include other uses". The proposal included factory outlets, multi-leisure, hotel and A3 units;
• Calder Island, a multi-leisure park proposal (24 screen multiplex, family entertainment centre, bowling, health and fitness, hotel, A3 units etc, 2km to the south of the city (called-in but withdrawn July, 1997). The site comprised old industrial buildings and was zoned for industrial use; and

• Yorkshire County Cricket Club (YCCC) stadium with complementary indoor and outdoor sports facilities at Junction 39 of the M1 (called-in but withdrawn September, 1998). This was a 90ha green belt site.

6.84 The issues to be explored in this case are:

• planning processes; economic regeneration and sustainability. Planning decisions have required the LPA to balance regeneration priorities with issues inherent in PPG6;

• regional planning. In planning terms, given the number and scale of developments in the area, there was a role for regional planning; the schemes were promoted as having regional catchments and there were various references by applicants and WMDC to the perceived threat of competing schemes in adjoining areas; and

• interpretation of policy. The different schemes, considered at different times, reveal different approaches by the local and regional planning authorities to key issues of national policy; the vitality and viability of town centres, trip generation and accessibility.

Key findings

Economic regeneration and sustainability

6.85 All three cases were justified by the LPA in terms of economic regeneration notwithstanding specific concerns relating to PPG6 and PPG13 issues. In particular:

• the YCCC concept "to create a world class cricket stadium as the new home for Yorkshire CCC" was seen by WMDC to offer image and prestige and the opportunity to lever other developments. "The overall aim of the UDP is the regeneration of the District and the creation of jobs." The priority given to regeneration over the PPG13 concerns raised by GO-YH in this case was given added weight by the pro-active approach taken by WMDC to attract this scheme which they clearly felt met their need to change the local image; and

• at Calder Island, this regional scale facility "would appear to be in line with the overall aims of the plan fostering economic growth, revitalising the urban area and improving the quality of life for residents". It was considered that "the benefits and opportunities offered by the proposal outweigh any concerns over the proposal and dis-benefits which may occur." These were considered to be a significant net gain in jobs and an additional range of leisure facilities of a regional scale, greater than would be provided in the established centres.
Regional planning

6.86 All three proposals were considered to be of regional significance in terms of their draw. This was one of their main appeals for regeneration. In planning terms, it is clear that Regional Planning Guidance had little useful advice to offer eg general statements that development plans should provide for recreational facilities "which would result in urban regeneration or the re-use of under-used sites" but which "should reflect the policies set out in PPG13".

6.87 The ineffective nature of this guidance was made explicit in a review of RPG12 prepared by local authorities.

6.88 All three application files revealed various references by applicants and WMDC to the perceived threat of competing sites/schemes in adjoining areas. "If (Calder Island) is not developed .. then these regional facilities could only be provided outside the metropolitan district." The YCCC scheme was under threat from a competing out-of-town site east of Leeds.

Interpretation of policy

6.89 Glasshoughton Snowdome is a proposal for a very large facility that clearly would be difficult to accommodate in a town centre even if dis-aggregated down to the ski slopes alone. However, a range of local facilities such as multiplex cinema, bowling etc have been permitted in order to add value to the leisure development. These facilities might be considered as ancillary or complementary enabling development in this context, but the potential repercussions in local town centres could be significant. A multiplex cinema, at this location, would undoubtedly impact upon the Westgate scheme but this was not assessed although a retail impact study was undertaken. This proposal was considered before revised PPG6 was published, but after the draft was circulated. Although referred to GO-YH as a departure, the application was not called-in.

6.90 At Calder Island, retail and leisure functions in the town centre were seen by the applicant as quite separate ie that if the centre was viable and vital in retail terms, out-of-centre leisure development was irrelevant. There was no attempt at analysing the overall impact upon the vitality and viability of the town centre. Some general assumptions were made.

6.91 Similarly, the applicant argued that town centres and out-of-centre locations were different in terms of the appropriate type of leisure development. Family leisure would be more appropriate out-of-centre while youth culture was more appropriate for town centres.

6.92 Consideration was given to the potential impact upon individual facilities (cinema and bingo) in the town centre. The methodology used by the applicant was not clear and (inevitably) showed under-provision in the city after the development. It also failed to take into consideration the cumulative impact of surrounding proposals, notably at the Snowdome. The committee report stated that the proposed multiplex "is likely to split the potential audience (at Westgate) at least in half" and that bingo and A3 uses may be undermined in the city centre.
affecting the viability of such uses but not the vitality of the town centre.

6.93 The Westgate multiplex operator expressed concern about the threat of an out-of-town scheme. (He originally felt he was protected by local adherence to national planning policy guidance.)

6.94 At Calder Island, there was no assessment of need for the individual elements other than the regenerative argument for a regional facility.

6.95 The Calder Island debate covered a number of pertinent issues relevant to PPG6:

- there was a lack of clarity in the definition of the site; it was described as out-of-town, out-of-centre or edge-of-centre in different contexts;
- there was no explicit evidence from the applicant of an alternative site search as part of a sequential test; and
- there was no consideration given to the availability of smaller sites to accommodate the individual uses; the concept of dis-aggregation was not clear at the time.

6.96 All the schemes raised issues of accessibility and trip generation in the context of PPG6 and PPG13:

- at Glasshoughton, it was noted by the LPA that the leisure proposals are "regional facilities which depend on good road access because they aim to serve customers who travel predominantly by car";
- at all three sites there were concerns about access which led to negotiations to provide new stations and/or extra buses. This was seen as a substitute for more accessible locations; and
- at Calder Island, reference was made to the number of bus routes that passed the site. No consideration was given to the quality and acceptable level of those services.

6.97 All the schemes were the subject of TIAs that considered safety and road capacity issues but not PPG13 issues.

Further issues emerging from the case study

6.98 This case highlights the relative priorities assigned by the LPA to local urban regeneration and PPG6. In the context of a plan-led planning system, the Wakefield UDP supported by its Economic Development Strategy is clear and explicit about the importance the District places on urban regeneration. "Regeneration is the underlying theme of the Plan and it influences to some degree all subsequent topic areas." WMDC believed these objectives took priority, in these cases, over many of the principles in national guidance. Should an LPA be able to give
precedence to local economic development priorities over general national planning guidance?

6.99 In terms of regional facilities such as the Snowdome, cricket stadium and the multiplex provision, clear regional planning guidance would have been helpful in terms of assessing need/capacity and regional competition for schemes. Is there a role for (sub)regional planning of major leisure developments?

6.100 Large schemes such as the Snowdome often require enabling leisure development eg the proposed multiplex. Are there circumstances where a special need can justify ancillary or complementary development that would otherwise be subject to the sequential test?

6.101 The Calder Island case revealed the need for an accepted form of leisure (cinema) impact assessment to be undertaken. Should a commonly agreed means of need assessment be agreed? How can needs assessments be prepared effectively and realistically?

6.102 It was clear in this case that the definition, let alone measurement, of the vitality and viability of a town centre is open to misinterpretation.

6.103 The TIAs did not address the wider objectives of PPG13.

Case Study Summary: Leisure And The Planning Process In Kettering

Location and background

6.104 The Borough of Kettering (KBC) in Northamptonshire includes the town (pop 46,000) and a rural hinterland that includes a number of villages including; Rothwell, Desborough and Burton Latimer. The district population is approximately 75,000.

6.105 Kettering is the central one of five relatively small settlements (Corby, Wellingborough, Market Harborough and Rushden) located within a larger area defined by the major towns of Leicester (26 miles away), Northampton (14 miles), Bedford (25 miles) and Peterborough (30 miles). Most significantly, Kettering is located directly on the new strategic A14 (A1- M1 link). The catchment population within a 20 minute drive of Kettering is around 270,000.

6.106 KBC had identified a need for new leisure facilities and, in particular, a new cinema. Notwithstanding general policies related to minimising the need to travel, KBC allocated an out-of-town site for a multiplex cinema in their Local Plan (adopted January 1995) to the north of the town on the grounds that "an area larger than Kettering Borough is required to sustain a five screen cinema".

6.107 In fact, a quite different out-of-town site on the new A14 south of the town centre came forward as an application in September 1995. This site was also perceived to extend the catchment to cover Wellingborough, Corby and into East Northants. When the application was considered, reference was made to the then draft revised PPG6 (and a lack of alternative sites). However, the LPA was convinced that an out-of-town site was needed to meet local market conditions and to fulfil the need established in the Local Plan. Planning permission was granted for an 8 (small) screen multiplex and three A3 units. The scheme opened in December 1997.
6.108 The relevant issues to be explored in this case are:

- the identification of need and its embodiment in the development plan; and
- interpretation of policy, notably:
- accessibility in a rural area; and
- impact on vitality and viability.

**Key findings**

**Need and capacity**

6.109 Kettering had identified a need for a new cinema in a leisure strategy (1987), local surveys and the Local Plan. The market was not, however, analysed and quantified in the way that more recent assessments have been undertaken eg Norwich.

6.110 Notwithstanding, this identified need was made explicit in the Local Plan and an out-of-centre site was allocated in the Local Plan ie the proposal went through the due processes of development plan preparation ie the allocation was retained following external scrutiny by the SoS and the development plan inquiry.

6.111 The allocated site was located adjacent to the Kettering western by-pass, 3km north west of the town centre. The justification in the Local Plan was that "There is a clear public demand for a new cinema to serve Kettering. Operators suggest that an area larger than Kettering Borough is required to sustain a five screen cinema. However, if the population of Corby and Market Harborough is considered then a site with good road links to those towns would be attractive. Land to the north of Kettering fulfils many of the criteria identified by operators."

6.112 When the application came in on a different out-of-centre site, KBC considered that the established principle was the same and considered acceptable.

6.113 Given the status of PPG6 at the time, no formal analysis of alternative sites or sequential test was undertaken but the issue was considered. However, the view that "it is doubtful if a suitable in-town site for a use of this type could be found" was based on the grounds not only of site size but also site prominence to attract people from further afield.

6.114 Regional planning guidance offered no suitable context for leisure development. The application was not referred to the County or Government Office.

**Accessibility**

6.115 The local plan allocation and the subsequent application site were out-of-town specifically to attract car-borne business from outside the local area. This was the argument put by developers for considering such a development in a rural area such as Kettering and
accepted by KBC. In theory, this argument is debatable. A drive into the town centre of
Kettering from the A14 would add only a few minutes to the journey for some visitors; the
catchment population within 20 minutes drive would probably have been unaffected. However,
this was an experimental location and in perceptual terms, the developers needed a highly
visible and accessible site for a dominantly car-borne audience.

6.116 KBC were influenced to an extent by their experience with the Kettering Leisure Village.
This was developed in 1993/4 combining public and commercial leisure in a new scheme
between the town centre and the A14. After 12 months, the project went into receivership,
largely through poor management and technical problems but the Borough also believes that
the product, which was geared for a sub-regional market eg ice skating, flumes, did not have
adequate access from the A14.

6.117 The view was taken that the facility would minimise travel distances between land-uses
in the immediate locality and lower the number of journeys currently taken to more distant
destinations. This argument is well known for retail cases but no specific research was
undertaken to justify this assertion. Evidence from the Young Peoples Survey suggests that
cinema-goers were travelling to the multiplexes at Northampton and, to a much lesser extent
Peterborough and Milton Keynes, but it is unclear as to how significant these volumes were. It
also appears that new markets - and mainly car trips - have been created by the cinema and
the family restaurants, and the cinema is now drawing users from Wellingborough where the
town centre cinema has recently closed.

6.118 It is reported by the operators that around 60% of customers come from Kettering itself,
20% from surrounding villages and 20% from further afield eg Huntingdon, Peterborough.
Probably more than 90% of customers arrive by car with taxis also playing a role.

6.119 KBC were concerned about public transport access, particularly in the evenings and
weekends. The issue was raised with the developer who felt this could be dealt with
subsequently. The local shuttle bus service was diverted into the leisure park (to a new bus
stop required by the planning consent) and the times of operation of one of the routes from the
town centre were extended till 10.30pm, Monday to Saturday but still no service on Sunday.
This was not as a result of a planning obligation but on request by the cinema operator, local
authority and students council. Despite the proportion of local customers, the loadings on this
new service have been "very disappointing" according to the bus operator, to the extent that it
was likely to be discontinued at the next timetable review.

6.120 A TIA was prepared by Northants CC that indicated that the existing road infrastructure
could satisfactorily accommodate the levels and type of traffic likely to be generated. It showed
that the time of peak flows to the cinema and normal peak flows would not be coincidental.
This would have the effect of lengthening the time of flow rather than increasing the volume at
peak times and may result in traffic late at night. The TIA, as in other case studies, looked at
road capacity and did not reflect on the generation of trips and accessibility in the context of
PPG6/13.

**Vitality and viability**

6.121 In the town centre, the old local cinema in Russell Street, Kettering closed down upon
the opening of the multiplex. This was expected given the physical state of the building and the
The two screen cinema in Wellingborough six miles away closed in December 1998. The operator reports that audiences had declined well before the Kettering opening, the competition from other multiplexes in the region was already telling. Kettering was just "the final straw". Despite the cinemas declining market, it is reported they retained a strong children's market and attracted others without access to private transport. The Castle cinema, an 'art house' in Wellingborough remained open and unaffected.

Despite the A3 development adjacent to the multiplex, there has also been a notable increase in A3 development interest in the town centre with two new themed pubs and four major refurbishments.

Further issues emerging from the case study

Kettering has satisfied their need for a cinema for the district. It has a first class facility in a low population, rural area that many developers would not consider. The proposal may have been contrary to PPG6 but if it had been refused, Kettering may never have attracted the needed cinema development that was clearly established in the Local Plan (see endnote 80). Should an LPA be able to give precedence to local economic development priorities over general national planning guidance?

As in other cases, the means of assessing need can be questioned; it was based on qualitative shortcomings in local facilities identified in the Leisure Strategy. PPG6 requires an evidence-based approach to analysis that is difficult and expensive to prepare. This could be a problem for small authorities. The Kettering Leisure Plan identified such constraints as far back as 1987. "The leisure department has limited staff capacity and it has been able to do relatively little detailed work on planning and assessing needs." Should a commonly agreed means of need assessment be agreed? How can needs assessments be prepared effectively and realistically?

The TIA referred principally to the capacity of the roads. Limited accessibility by all modes other than the car was acknowledged but not considered to be an over-riding planning issue and no direct action was negotiated with the developers by way of planning obligation. PPG6, as now interpreted, would dictate such action although in this case, the provision of a bus service has proved unsuccessful. Should TIA's take on a broader role, as now proposed, assessing impacts on the wider objectives of PPG13?

There is no evidence that the development has had a negative impact upon the vitality and viability of Kettering town centre; the old cinema would have closed wherever the new facility was located and new A3 has been developed in the centre. However, consideration was not given to the opportunity cost i.e. the contribution a new cinema (and A3) could have made to the town centre. There was no attempt at analysing the overall impact upon the vitality and viability of the town centre (or the nearby Wellingborough town centre). Can the contribution of leisure to the vitality and viability of town centres be defined and the impact of leisure development be assessed realistically?

As evidenced elsewhere, there was concern that the development may have gone elsewhere in the region if consent had not been granted. Is there a role for (sub)regional
planning of major leisure developments?

Case Study Summary: Leisure And The Planning Process In Bicester

Location and background

6.129 Bicester (1991 population 22,128) and Banbury (39,906) are the two main towns within Cherwell District. Banbury is 15 miles north west of Bicester and both towns are on, or close to, the M40. Other towns in this largely rural area north east of Oxford (Buckingham, Brackley and Kidlington) are much smaller.

6.130 The boundary of Bicesters catchment area is defined by larger towns some distance away; Aylesbury 16 miles to the east (more than twice the size of Bicester), Milton Keynes 20 miles to the north east, Stratford upon Avon, Warwick, Leamington Spa and Coventry are a considerable distance away to the north, although accessible via the M40. High Wycombe to the south is also accessible by the M40. Oxford, however, which has a population five times the size of Bicester, is only 11 miles away to the south west.

6.131 Bicester has no commercial leisure facilities. A site was allocated in the Cherwell Local Plan for hotel and leisure development. The site was deliberately out-of-town as there were considered to be no suitable sites in the town centre for this type and scale of development. A large private sector scheme, including a multiplex cinema (originally 8-14 screens but subsequently reduced to 6-8 screens), bowling, health and fitness centre, A3 units, a 100 bedroom hotel and 980 parking spaces was proposed, including the site allocated in the Local Plan for hotel and leisure use. The site is very close to Bicester Village Factory Outlet Centre (FOC), a foodstore and the M40.

6.132 The leisure development proposed was larger than the Local Plan envisaged, occupying a site three times the size of the allocated site. It included a new perimeter road that was considered by Cherwell District Council (CDC) to be a significant planning benefit.

6.133 After the planning application had been submitted and before the Committee met to decide the application, a commercial leisure scheme, anchored by a multiplex cinema, was proposed in Banbury town centre.

6.134 A planning application was submitted for the Banbury proposal but a decision was deferred in March 1998 until a response was received from the County Highway Authority. In June 1998, the Bicester application went to Committee and was refused on Highway grounds (directive from the Highways Agency), although Cherwell District Council was minded to approve. The Banbury proposal has subsequently received planning permission and, in a slightly revised form, is expected to commence construction in 2000.

6.135 The relevant issues to be explored in this case are:

- interpretation of policy; need, capacity and planning impact. Was there need or capacity to support a scheme of the size proposed in Bicester, considering the size of the town and its hinterland, particularly in relation to the larger town of Banbury with its alternative proposal?
Key findings

**Need and Capacity**

6.136 Leisure facilities within Cherwell and nearby towns were poor. Local inhabitants were apparently travelling considerable distances to visit modern cinema facilities and it was considered that there was a need for modern leisure facilities locally. The Bicester proposal was an opportunity to achieve this.

6.137 The applicants leisure impact study indicated an unmet capacity that purported to justify development in Bicester. No adverse impact on nearby centres was considered likely. However, after the consultants studies were submitted, a similar leisure scheme was proposed on a town centre site in Banbury.

6.138 Clearly, there was a deficiency of modern leisure facilities in north Oxfordshire at the time the Bicester scheme was proposed, even when a proposed leisure scheme in Oxford town centre (at Oxpens Road) was taken into account (subsequently refused on appeal at the end of 1998). The issue relating to capacity is whether this capacity should have been accommodated in Bicester or whether it would have been more appropriately located, taking account of the location of population and the need to minimise overall travel times, in the larger towns of Oxford or Banbury.

6.139 In view of the uncertainty of the proposal in Oxford and, initially, the lack of a proposal in Banbury, there was some justification for looking upon a proposal in Bicester favourably, especially as there was a 2 screen cinema and a night-club in Banbury and various cinemas and leisure facilities in Oxford. However, once a town centre leisure proposal (including multiplex cinema) emerged in Banbury, there must have been doubt as to whether there was the capacity for similar schemes in both Banbury and Bicester. If the Bicester scheme had been given planning permission, this would probably have threatened the viability of the Banbury town centre scheme and prevented it from being developed. This proposition was not considered in the applicants impact study as it was prepared just before the Banbury proposal emerged. There is no reference to this possibility in the officers' committee report.

**Sequential test**

6.140 Bicester is a small, compact market town with few sites in the town centre (a conservation area) suitable for new development. The development proposed was on a site three times the size of the site allocated in the Local Plan. The LPA went to considerable lengths to suggest alternative sites and draw up, in outline, how the scheme could be disaggregated and developed on separate sites, with the hotel separated from the multiplex and leisure development. However, the only two sites which could accommodate the dis-
aggregated scheme were edge-of-centre, rather than town centre, sites and one of them was not available for development. This site, adjacent to the FOC, is allocated as an employment site in the Local Plan and is owned by the main owners of the FOC. The other owners were the applicants for the leisure scheme.

6.141 The applicants assessment of alternative sites in Bicester showed that there were no alternative town centre or edge-of-town centre sites that could accommodate the proposed development. Eventually, this was conceded by the LPA.

**Accessibility**

6.142 The lack of leisure facilities in Bicester meant that the proposed leisure development in Bicester would have reduced the amount and length of trips for residents of Bicester and its hinterland. However, the size of the scheme would have encouraged trips from a wide area, (a point the Leisure Impact Study relied upon to prove capacity) and so the net overall effect on the number and length of trips is debatable. As the site is out-of-town, there is also a question over accessibility by public transport. The County Council considered that the proposed development was contrary to the principles of sustainable development and that it would not be well served by public transport, even after improvements put forward by the applicants.

6.143 The objections from neighbouring local authorities and the County Council included:

- the amount of traffic generation;
- that the site was not well served by public transport;
- the inappropriate scale of the development for a small market town;
- the additional land-take compared with the Local Plan allocation;
- the precedent that would be established for development between Bicester and the M40; and
- the proposal was contrary to Government guidance in PPG6 and PPG13.

6.144 CDC officers, however, took a different view. Their report to CDC Planning Sub Committee supported the Bicester leisure proposal. They considered that:

- the site was the only one in Bicester suitable for major leisure development, particularly as Bicester has a compact historic centre;
- the scheme offered good access/visibility, excellent communications and was aesthetically attractive; and
- it was the minimum the market was likely to develop and "not so large as to cause a detrimental impact upon the vitality and viability of nearby centres, nor result in the closure of existing facilities."
6.145 A Direction from the Highways Agency led to a refusal of planning permission. Their concern was that access to the site conflicted with their policy of not permitting new accesses to trunk roads, and that the traffic generation would be higher than estimated by the applicants, and so in conflict with PPG13.

**Further issues emerging from the case study**

6.146 In a largely rural area such as North Oxfordshire there are few leisure facilities. The proposed development at Bicester would have met an established need for a wide area. Although the proposal was on an out-of-centre site, part of it was allocated in the Local Plan, and there were no alternative suitable and available sites in Bicester to accommodate the development, even in a dis-aggregated form. However, with Oxford 11 miles away and Banbury 15 miles away, consideration could have been given as to whether such a large scheme could or should have been located in either of these bigger towns. When, late in the day, a similar scheme was proposed in Banbury town centre, no consideration appeared to be given as to whether both schemes could or should have been developed. Is there a role for (sub)regional planning of major leisure developments?

6.147 The Bicester proposal was the subject of numerous objections by various bodies relating to the scale of development, its out-of-centre location, its poor accessibility by public transport, the degree of traffic generation and the additional trips which would be generated due to the schemes extensive catchment area. However, the Council took the view that there might be an overall reduction in car usage. Does the (rural/isolated) location of a development site have any bearing on the issues of trip generation?

6.148 The Council also took the view that the scheme would not have a detrimental impact upon the vitality and viability of nearby centres. Can the contribution of leisure to the vitality and viability of town centres be defined, and the impact of leisure development be assessed realistically?

**Case Study Summary: Controlling The Impact Of A3 Development In Ealing**

**Location and background**

6.149 Ealing, approximately six miles west of central London, is a residential suburb that grew up rapidly following the arrival of the railway in Victorian times and the Underground in the first half of this century. Ealing is known as the 'Queen of the Suburbs' and much of the central area is protected by Conservation Area designation. The town centre is a metropolitan shopping, leisure and administrative centre. Housing comes close to the town centre; there is no intermediate or secondary area to act as a buffer between the town centre uses and the residential areas.

6.150 In the mid to late 1980s, a number of factors led to national changes in the drinking and entertainment sectors (see Chapter 2) with subsequent major growth in this sector of
restaurants, pubs and bars.

6.151 Central Ealing has always had a good representation of pubs and has proved to be a highly attractive location for these new developments given its good accessibility, swelled by the expansion of local higher education facilities. In Ealing town centre, between 1990 and 1995, there were 25 applications for change of use from A1 to A3 (plus 6 extensions) and 8 from offices to A3. The growth of liquor licences has also been significant. Not only were there applications related to new A3 uses but existing A3 uses eg cafes, take-aways, restaurants and pubs were changing in concept (without requiring planning consent) and seeking new licences. Over the same period there were 20 new on-licences and 11 restaurant licences in Ealing town centre. There are currently over 40 on-licenses just within the town centre. The growth of entertainment licences has been less significant but in 1998 there were 10 premises with accommodation for 3,290 plus the cinema that holds 1,376.

6.152 Initial concerns built up in the early 1990s amongst residents with respect to a perceived:

- loss of A1 affecting Ealing's strategic function as a retail centre;
- concentration of A3 uses leading to public disorder disturbances and deterring potential visitors;
- conflict of amenity with residents; noise and traffic in the early hours;
- degradation of the environment; litter, broken glass, urine etc; and
- reduction in facilities for other groups of users eg families and the elderly.

6.153 The scale of individual units has not been identified as a specific problem as has been reported in some other destinations. Equally, there has been little trouble with individual premises. The real concern has been over:

- the ease with which shops could become innocuous cafes or restaurants, and then turn into pubs or bars with entertainment that encouraged large groups of young people;
- the cumulative impact of a number of units that has tipped the balance from a diversified evening economy to an environmentally unacceptable situation, with potential impact upon the vitality and viability of the town centre; and
- the amenity and disorder problems that have arisen as intoxicated youths spill onto the streets when the late bars and clubs close and look for food and/or transport home. (While access to Ealing centre is excellent, public transport home in the early hours is limited.)

6.154 The relevant issues to be explored in this case relate to the means of controlling negative impacts of A3/D2 land-uses upon the town centre ie by means of:

- a formal planning response; and
• a co-ordinated management response to the problems.

6.155 PPG6 acknowledges this potential problem. "Changes of use, whether in town, district or local centres, can however sometimes create new concentrations of single uses, such as restaurants and take-away food outlets, where the cumulative effects can cause local problems. Such proposals should be assessed not only on their positive contribution to diversification, but also on the cumulative effects on such matters as loss of retail outlets, traffic, parking and local residential amenity." PPG6 suggests "These issues should be resolved when making planning decisions, rather than permissions being un-implementable when licences are refused". (para 2.25)

Key findings

The need for co-ordinated action

6.156 Public concern was first expressed in the form of objections to planning and licence applications from the local community. Prompted by the Ealing Community and Police Consultative Group, Council officers contacted the magistrates and the Civic Society and set up a new working group on which all the relevant interests were represented. This initiative was co-ordinated by the borough planners who prepared a comprehensive report in January 1996 to set the scene.

6.157 As the problems became more obvious to local residents, they also began to find out the difficulties in mounting any objections. The rules and arrangements for objecting to the three authorising bodies are different and complex. The judicial procedures are harsh for inexperienced witnesses and applicants are bringing heavy forces to bear in bids to win licenses. In addition to the cost of preparing an objection, there is the deterrent of an award of costs against objectors. The Police and local authority therefore do not normally object to applications, they make observations only.

6.158 The working group was established in April 1996. Actions fall under two response headings; formal planning proposals and a series of management initiatives.

The planning response

6.159 The planners undertook:

• the preparation of SPG for 'Places for Drinking and Entertainment in Central Ealing'. This was the first 'set of brakes' to be applied;

• to lobby for changes to the Use Classes Order;

• to make changes to UDP policy for Central Ealing;

• to consider every application in the context of its cumulative impact on the environment of central Ealing;
• to seek the advice of the local Police on design and community safety matters in making decisions; and
• to facilitate community involvement in the planning (and licensing) procedures.

Supplementary Planning Guidance

6.160 It was felt that existing UDP policy covered the main issues but there was a need to marshal the Council's planning policies in one place ie promoting a balance between the vitality and viability of the centre with community safety, access, residential amenity and environmental quality.

6.161 SPG was produced in November 1996, building on the UDP policies for the town centre but with further consideration of opening hours, noise, traffic, public transport access, parking, safety, the character of the area, advertising etc. The SPG is based on five tenets relating to; protecting the retail function, promoting a range of community facilities, protecting and promoting residential use, enhancing the character of the area and taking account of transport implications.

6.162 Associated model conditions were also compiled to "enable some proposals to proceed where it would otherwise have been necessary to refuse planning permission". Model reasons for refusal relating to the five concerns highlighted in the supplementary planning guidance were also suggested.

6.163 The SPG did not include new policy. It pulled existing policies together and gave fuller explanation of the reasoning, in particular the problems of cumulative growth.

6.164 In May 1997, the Proposed Alterations to the UDP were placed on deposit for public consultation, incorporating the SPG. The UDP revisions and additions provided statutory support to the SPG.

The UCO

6.165 In 1987, the Use Classes Order was amended, grouping together all forms of hot food and drinking establishments. In some places, this has allowed many changes of use from pubs to restaurants and take-aways and A2 uses without the need for planning consent. The main problem in Ealing has been the reverse trend, the ability of cafes and take-aways to turn into restaurants, then into wine bars and pubs (often with ancillary entertainment) without requiring planning permission.

6.166 LB Ealing(LBE) made representations to the National Planning Forum(NPF) in 1996 urging a review of the A3 Use Class. The representations were reflected in the final report by the Forum which is now being considered by Government.

6.167 The draft report proposed a split in the A3 class, hiving off take-aways (as per Scotland). There were no proposals for distinguishing between pubs and restaurants (the sale of alcohol has not been seen as a planning issue as such) but following submissions from Ealing and the
general concern in London about 'superpubs' and their ancillary activities, the NPF changed their recommendations to divide Use Class A3 into:

- A3(i): Sale of food for consumption on the premises;
- A3(ii): Sale of hot food for consumption off the premises, including mixed-uses where part of the use of the premises is for consumption of food on the premises; and
- A3(iii): Public house, wine bar or other establishment for the consumption of drink on the premises.

6.168 Revised wording to control uses within the A3 Use Class was suggested ie "Where permission is given for use as a restaurant, specific consent will be required for any other future use, including bar use and the sale of hot food for consumption off the premises, if this may adversely affect the amenity of residential and any other uses in the local area." (S18). It was suggested by the Government Office for London (GOL) that this would be inappropriate as a general policy in the context of the UCO, but LBE are considering it for Ealing town centre specifically.

Proposed changes to the UDP

6.169 Policy (S18) in the UDP stated that "where permission is given for use as a restaurant, specific consent will be required for the sale of hot food for consumption off the premises, if this may adversely affect the amenity of residential uses in the local area". In 1997, LBE proposed alterations to the UDP to include bar use along with take-aways as another special category requiring consent. This alteration was deleted on advice from GOL as it was perceived to be effecting a blanket change to the UCO. In a recent attempt to impose such a condition on a planning consent (1999) on a restaurant (outside the town centre), the Inspector rejected the condition on the grounds that this was a licensing matter. However, LBE has now included the bar category in a revised policy S18 for the deposit draft of the new UDP, but limited the policy to Central Ealing only. LBE believe that such a policy, circumscribed to a specific area in relation to a specific problem, should be acceptable.

The current situation

6.170 Since November 1996 (publication of the SPG), there has been a decline in permissions granted for A3 and also of applications coming forward. In May 1996, the local authority won an appeal against the change of use of a bank (A2) to a 'Slug and Lettuce' bar (A3) in central Ealing. This pre-dated the SPG but the Inspector took the cumulative impact into account on the basis of the evidence already prepared "there is a good deal of evidence before me to indicate that the large number of eating, drinking and entertainment facilities in the centre of Ealing is causing serious problems of late-night noise and disturbance to local residents from the activities of patrons"......"I would expect it to significantly add to the general bustle and congregation of people in the vicinity around midnight." He concluded that "the amenities of neighbouring residents would be unacceptably harmed by the proposal and that the development criteria at issue would not be met."
Although the planning department has not monitored enquiries, anecdotal evidence from the Senior Planning Officer suggests that the SPG has been most effective in raising the profile of the problem and making it clear to potential developers that the Borough takes the issue seriously. There have been no planning applications for A3 in central Ealing for two years despite the high level of development interest in A3 nationally. There is evidence of development interest growing in other parts of the Borough and, by 2000, there appeared to be an increase in the level of pre-application inquiries from potential A3 developers in the town centre.

The management response

6.172 The first priority of the working group was to co-ordinate action between the parties involved:

- the LPA;
- the local authority licensing panel;
- the local authority building control department;
- the Magistrates licensing committee;
- the Police;
- the Fire Brigade;
- the residents; and
- the licensed trade.

6.173 The first significant success, facilitated by having a Chair with experience as a magistrate, was to get all these parties involved in a dialogue concerning the perceived problem.

6.174 One of the most significant initiatives has been the arrangement for a planner to attend all licensing applications and advise the licensing committee of pertinent planning issues. This started as a simple reporting of relevant consents, conditions etc but the role has been developed such that the planner now provides advice on wider planning issues eg as if the application was for planning permission. This advice has proved extremely helpful to the magistrates. (The licensing committee requests that applicants have planning permission and building regulations approval before seeking a licence.)

6.175 Liaison with the magistrates has extended further. The licensing committee has prepared a policy statement and now actively uses its discretionary powers to consider amenity issues. (Need is no longer an issue.) Applicants have to provide maps of the surrounding area showing licensed premises in order to help calculate the environmental impact. These considerations are greatly aided by the presence of the planning officer.
6.176 An important innovation by Ealing magistrates has been their use of conditions on-licences to effect controls on amenity and, indirectly, the nature of the establishment and its clientele. For example, applying conditions restricting the playing of music, dancing, games including pool and video, applications for occasional/special licences, drinking on the pavement and even the style of operation. Six new on licences have been approved between 1996 and 1999, four of which have been subject to the above conditions.

6.177 The Licensing Panel in the Council has also prepared a Policy Statement for its own purposes and to help applicants. This includes reference to the cumulative impact of a proposed entertainment licence on amenity and public safety in the local area.

6.178 The Police have developed and extended the local 'Pub Watch' scheme. In particular, they have been working with licensees - and their regional managers - on a range of issues, including:

- use of trained door-staff;
- working with taxi firms to expedite dispersal;
- avoidance of over-crowding by, for example, charging for entry; and
- staggering closing hours.

6.179 Ealing is the first division in the Metropolitan Police to use S16 of the Crime and Disorder Act as a basis for objecting to a licence application. This section states that it will be the duty of local authorities to exercise their functions to prevent crime and disorder. Although this particular application was outside central Ealing, this was also the first time the Police had objected to an application rather than just making observations. The implications of this new legislation are yet to emerge.

6.180 Other important local initiatives have included:

- installation of CCTV in Ealing Broadway with Home Office funding;
- assistance with 'How to Object', a written guide (leaflet) for objectors to planning and licence applications, prepared by Ealing Civic Society;
- consideration is being given to a 'Nightwatch' project, to extend the Pub Watch scheme beyond licensed premises to include retailers, bus, train and taxi firms, office security managers and others who have an interest in the evening economy; and
- the Responsible Host scheme launched by LBE, the Metropolitan Police, the private sector and the London Tourist Board in 1998. It is a voluntary awards scheme for proprietors of places for eating, drinking or entertainment in Ealing. The scheme aims to encourage licensees "to create a welcoming environment in a non-restrictive way by seeking the voluntary co-operation of local businesses." The awards are in recognition of, and seek to encourage, management quality including the amelioration of environmental impact on residential amenity. Guidelines have been established based on concerns experienced by local people and encompass street safety, residential amenity and quality
By 1998, the combined efforts appeared to be having an impact. In development terms, the flow of planning applications had virtually stopped. Ealing was seen as a difficult place to get permission for new, additional premises. Major operators were seeking to enter the local market by acquisition rather than new development. In management terms, it is more difficult to measure success objectively. Additional on-licences have been granted but the imposition of conditions means that the nature of the premises are quite different. It is too early to assess the wider implications of this initiative.

The success of the Responsible Host programme and other management initiatives are even more difficult to judge. The police report some reduction in disorder and a generally more responsible attitude towards drinking. Local residents perceptions remain that central Ealing is still an unpleasant environment on Friday and Saturday evenings. The various management initiatives are perceived to have been a success in raising awareness of the problems and, perhaps, even more importantly, there is a clear perception that the different parties are working together to try and manage the identified issues.

Further issues emerging from the case study

Ealing planners have responded to a difficult situation with positive action by coordinating pro-active planning and management to help resolve problems associated with A3/D2 uses. Should planners become involved in wider management issues? Is the approach of combining planning and management an effective response to the problem?

The working group of different interested parties provided an effective focus for discussion and has acted as a catalyst in the development of new planning and related management initiatives to help alleviate the problems. However, this kind of approach requires commitment and resources to sustain the active involvement of individual parties and the working group as a whole. Can a management/partnership type of approach to A3 development issues be sustained?

The cumulative impact of A3 development in Ealing is a planning concern not only in terms of amenity but also in terms of its potential impact upon the vitality and viability of the town centre ie other activities and businesses. The growth in amenity problems experienced in LBE can be seen to be closely associated with the current UCO. Is there a need to change the UCO in relation to A3 development?

In management terms, liaison between the planners and licensing authority is essential. This case offers some important lessons. How can planning and licensing work together most effectively to help control and manage the problems associated with A3 development?

Case Study Summary: Developing A New Leisure Quarter In Sheffield

Location and background
The Cultural Industries Quarter (CIQ) is on the southern edge of Sheffield's shopping core from which it is currently separated by a four lane highway. It was originally a manufacturing area, home to small firms making high quality cutlery and to engineering works. Following the recession and restructuring of the early 1980s, Sheffield City Council (SCC) sought to regenerate the area by assisting existing industry and by encouraging development of new industries. Initially, the process was public sector led as previous manufacturing uses were replaced by cultural production and consumption. The opening of Red Tape Studios in 1986 was a key date; as was the first night-club in 1988 and the Showroom independent cinema in 1993. More recently, there has been an increased focus on leisure and tourism, including A3 and D2 activities, and on securing more substantial private sector investment.

The area has not traditionally formed part of the city's entertainment area and was seen as off the circuit by potential customers and investors/operators. However, Sheffield railway station and its transport interchange are at the north east edge of the area and the route from the station to the central core passes along the edge of the CIQ. Sheffield Hallam University's (SHU) main location, which includes the Student Union building, adjoins the Quarter, and SHU has a Science Park and student residences within the Quarter itself.

There are currently more than 150 businesses in the area, including film and video production, graphic design, sound recording, record labels and a wide range of support services, as well the traditional cutlery makers. Significant culture/leisure developments include:

- Red Tape Studios;
- AVEC, managed workspaces for 16 media production businesses;
- Site Gallery (photography and imaging);
- Workstation, managed workspace, for 40 cultural businesses;
- Yorkshire Artspace with premises for artists and craftspeople;
- Leadmill, the first live music/dance theatre venue;
- Showroom, an independent cinema;
- Showroom café-bar;
- The Republic night-club in a former engineering works, an important early private sector investment, now of regional significance;
- The Niche night-clubs, recently refurbished; and
- National Centre for Popular Music (opened March 1999), a major new attraction in a striking new building with bar and café.

The relevant issues to be explored in this case are related to pro-active planning to help
develop a new leisure quarter:

- the timescale for regeneration, the infrastructure required and the role of the public sector as a catalyst. The development of the area has been going on for over 15 years, and a new 10 year strategy is in the process of adoption. This should see the transformation complete after more than 25 years;

- the value of partnerships. The Sheffield approach stresses public/private/community partnership, marketing and promotion as well as statutory planning (as advocated in PPG6, Annex C);

- the opportunities and constraints on dealing with potential conflicts between different activities in a mixed-use area, including sub-zoning; and

- the relationship between planning and development policies and licensing policies.

Key findings

Timescale, infrastructure and the role of the public sector

6.191 Since 1980, the area now known as the CIQ has developed cultural production industries and is beginning to expand as a focus for leisure activities. Whilst development in the area was initially heavily dependent upon public sector support, there are now some signs that it is achieving critical mass for further cultural and leisure developments and is beginning to attract significant private investment. The presence of a large student population within, and close to, the area is seen by some developers as a substantial potential market for leisure activities. The CIQs position at present is still fragile, however, and the target of 50 additional A1/A3 businesses (see endnote 81) within 5 years is demanding. Public sector support is still required. The CIQ has been funded through SRB but is now also included in the Single Programming Document (Objective 1 ERDF funds). A cost of £8.5 million over 5 years is envisaged (which is expected to add £50 million to GDP).

6.192 The Music Garden proposal reflected this timescale issue and the difficulty in getting a new initiative off the ground in an untried area. This major development of six themed bars and a night-club was expected to be the catalyst for A3/D2 leisure in the area in 1999. However, following protracted negotiations and eventual licensing problems, the developers sold the site and the planning process has had to re-start. The new owners are more inclined to develop student housing but SCC is keen to develop mixed-uses. Negotiation is underway with inherent delays but it is now hoped to attract A3 uses as part of the scheme.

6.193 The publicly funded landmark attraction, the National Centre for Popular Music, was expected to bring publicity, increase awareness and improve the image of the area. However, NCPM has had a difficult first year and a new operational strategy is being developed; the immediate future is uncertain.

6.194 Other A3 schemes have come and gone but there are a number of new proposals under
construction or committed including:

- Browns Bar (a new-build pub/music venue);
- new studios (Yorkshire Artspace/BBC);
- SHU Cultural Studies Department;
- a new pub/feeder bar for one of the night-clubs; and
- significant new A3 proposals at the station.

6.195 The area is extremely well served by public transport, with the rail station, the transport interchange and Supertram stops nearby; it is also within walking distance of some developing city centre residential locations. Leisure development here is thus very much in line with PPG6 objectives and guidance. However, car access remains an issue. The SCC Action Plan for the area seeks to reduce car dependency, promoting walking, cycling and improved bus facilities. It also seeks to discourage commuter parking within the CIQ, encouraging use of surrounding car parks for visitors to the area. Several of the operators interviewed mentioned inadequate car parking and access to the area.

**Partnerships**

6.196 To date, the area has been developed through partnership, marketing and management approaches, which is in line with PPG6 (para 2.9/Annex C), but without appropriate land-use strategies. The initial emphasis was on building networks between local producers/entrepreneurs and SCC. This relationship became formalised as the CIQ partnership. The process was "strategy led and action driven", with an emphasis on learning, and building up a focus of cultural and then leisure activities in one area. This approach was flexible and opportunistic.

6.197 A disadvantage of this approach referred to by some interviewees was that it lacked certainty, which made investment and funding more difficult. Effective planning policies might reduce this problem; the new CIQ Action Plan (see endnote 82) prepared by SCC planners is a response to this issue.

6.198 There is still an emphasis on marketing the area for development, on working with businesses and developing strategic partnerships with key players as well as on traffic management and land-use measures. The CIQ Partnership plays a central role and a new CIQ Executive was appointed in early 2000 to "champion the area, facilitate development, liaise on planning applications, mobilise resources, promote the area and organise events".

**Mixed-use development**

6.199 PPG6 stresses the advantages of a diversity of uses that can contribute to vitality and viability, and advises that LPAs should establish policies for mixed-use areas. Not all leisure activities are compatible one with another in the same immediate area. In particular, noisy and/or late night activities may put off users of other leisure facilities and are incompatible with
residential development. There is the possibility that leisure development can reduce town centre diversity if it results in a youth mono-culture which discourages other people. This has not occurred so far in the CIQ, but is already an issue elsewhere (see Ealing case study).

6.200 The CIQ Action Plan is a new "strategy for development, transportation, environment and visitor management". It seeks to provide the land-use planning context that has been seen to be missing (the confidence of a clear physical vision for investors) and to promote, in planning terms, the new ethos for the area ie as a contemporary, vibrant, 24 hour visitor destination.

6.201 The Action Plan envisages clusters of bars, restaurants, clubs, venues etc and sets relevant objectives/guidance on diversifying the experience, the environment (including design guidance) and traffic management. In particular, SCC is seeking to promote mixed-uses. This is evolving in a number of ways:

- viewing development within the CIQ in sub-zones. For example, a late-night zone is suggested around the Leadmill area. It is not yet clear whether this will be an effective control in resolving future amenity problems;
- mixing leisure activities in the CIQ; café-bars, an independent cinema, a tourist attraction, galleries as well as pubs and clubs. However, it is not clear how this mix could be assured if there were many applications for similar types of A3 uses ie pubs, as elsewhere in the country;
- combining related uses eg student accommodation, convenience retailing and leisure (pub) as at Truro Works. The development prospectus for key sites identifies options in the Action Plan. Detailed design is crucial in avoiding amenity problems at this micro level; and
- SCC has developed new guidelines on the factors that will be taken into account when considering proposals for housing in such mixed-use areas.

6.202 However, the development of the CIQ is subject to the UDP (adopted 1998 but prepared well before PPG6 revised was issued). The UDP calls for leisure uses to be focused in the central area but it identifies the CIQ as a fringe industrial and business area; B1/B2 activity is the preferred use in the plan while A3 and D2 uses are acceptable. The change from cultural production to consumption, inherent in subsequent economic development strategies and now embodied in the Action Plan, can therefore be accommodated within the parameters of this policy, as long as the overall balance does not change. This formality can be problematic eg in justifying leisure uses on the ground floor of business development sites. Equally, it has proved difficult to control other land-use development in areas where they would like to see leisure uses and want to avoid amenity conflicts. In such cases, SCC has had to rely on non-planning measures. The Action Plan, when adopted as SPG, will help overcome some of these problems as a material consideration but the primacy of the UDP will remain.

**Licensing**

6.203 Licensing of A3 and D2 uses has been problematic in the CIQ. There seems to be agreement amongst operators and local authority officers that new licenses have been very
difficult to obtain eg the Republic night-club was refused licenses on three occasions but appealed successfully to the High Court with support from the Chamber of Commerce and SCC. Interviewees argued that magistrates were reluctant to grant additional licenses from a perception that to do so would encourage more drinking. There has been no disorder problem in the area. (Existing licensees, who wanted to avoid further competition, supported the magistrates.) The Music Garden night-club proposal was refused a licence on the grounds of need, apparently one of the last cases in the country to use this reason for refusal. Such a stance has made it difficult to develop the new area for A3 and D2 and it is estimated that up to 30 new licences will eventually be required in the CIQ area.

6.204 Some interviewees felt that, since The Republic case, there has been a greater willingness to grant new licences, and four subsequent applications were granted. Others felt that the position was still difficult and this was endorsed by the Music Garden proposal but, again, there is a perception that licensing attitudes have changed further.

6.205 Whilst licensing is crucial to the areas development, it has not been successfully included in the CIQ Partnership. Guidance issued by magistrates indicates that they take account of planning issues in that they will not accept applications unless planning permission has been granted, but there is currently no mechanism to include licensing within a more proactive and positive planning process.

Further issues emerging from the case study

6.206 Despite excellent public transport and its obvious appeal to certain sectors of the leisure market, there remains pressure from operators to relax local parking and traffic controls. Are there special issues relating to accessibility to leisure development?

6.207 Management, marketing and land-use planning need to work in partnership. Careful management and formal plans are needed to ensure that leisure activities do not conflict with one another or with other developments. The approach must be fine-grained and should involve clear, integrated policies from local agencies, planning and licensing authorities. Local partnerships that integrate management approaches and promote consensus are desirable. Can such an approach be integrated into planning policy guidance?

6.208 Ideally, policies should promote diversity of land-use and a mix of leisure uses to prevent dominance by one type of leisure use. Sub-zoning and detailed design is important in amenity considerations. Flexibility in planning is important. Can the necessary flexibility be provided within the legal constraints of an adopted development plan? How useful is Supplementary Planning Guidance (SPG) as a tool for leisure planning?

Endnotes

78. Report to NCC on proposed multiplex cinema developments in Norwich, Dodona Research, June 1997
79. Wakefield UDP, Vol 2, 2.1,1994
80. It is reported (Planning, March 1997) that if the proposals were under consideration now, officers would be taking a more cautious line, without saying the outcome would be any different.
81. Target set by consultants
82. Cultural Industries Quarter Action Plan, Consultation Draft, October 1999
7. Planning For Tourism: Development Plans

**Introduction**

7.1 In this chapter, consideration is given to how tourism has been dealt with in the plan-making process and, in particular, whether plans are incorporating Government planning policy relating to tourism. The chapter reports the main findings of the 1999 survey of LPAs, a review of a small sample of development plans and wider consultation. Details of the LPA survey are given in Appendix IV.

**Background studies**

7.2 This section considers the extent to which LPAs are undertaking the background work and consultation with the tourism industry which is necessary to "identify future trends" and "the implications of these trends" for their areas (PPG21 para 4.11).

7.3 The survey of LPAs indicates that relatively few authorities are undertaking the background work. The extent of such work is set out in Table 7.1.

**Table 7.1:** Background research for tourism in development plans - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

7.4 A third of LPAs had undertaken surveys of existing facilities in the preparation of either their adopted or emerging development plans, with a slightly larger proportion reporting such work for their emerging plans. Only 17% of LPAs had undertaken demands/needs studies for either plan; such work was twice as likely to have been undertaken for emerging plans as it was for adopted plans.

7.5 Liaison with the tourism industry in order to identify its needs was increasing in the preparation of plans, but there was still only a relatively small proportion (20%) of LPAs that had undertaken such liaison. Such liaison was more common amongst rural LPAs than urban LPAs. Consultation with operators and developers was undertaken by more LPAs but still less than a third of respondents (28%) had carried out such consultation. Only 18% of LPAs had undertaken a search for sites for their emerging plans.

7.6 Although a greater proportion of LPAs are undertaking background studies and liaising with the tourism industry for their emerging plans, the proportion doing so is still relatively low. County councils and metropolitan authorities were less likely to have undertaken such work than were other LPAs. The level of background work and liaison with the industry was only very slightly higher amongst those LPAs stating that they were facing development pressure for tourism uses.

**General locational policies or strategies**

7.7 Almost two thirds of responding LPAs stated that they included general locational strategies for tourism in either their adopted or emerging plans.
Table 7.2: Strategies and policies for tourism - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

7.8 National policies advise a criteria-based approach to preferred locations for tourism uses. PPG13 (1994) stated that local authorities should ensure that major attractions are readily accessible by a range of means of transport and where possible use sites in existing urban areas. PPG6 advocates locating major generators of travel in existing centres. In addition, it states that a sequential approach should be applied to all key town centre uses that attract a lot of people. The examples listed did not include tourism uses, although elsewhere hotels and conference centres are listed as uses that can make town centres more attractive by adding variety. Tourism is a use to which the approach may, rather than does, apply.

7.9 A review of a sample of plans found that most plans produced after PPG13 was published promote the location of tourism accommodation within or, in certain circumstances, on the edge of existing settlements. In several plans, policies state that where developments are proposed on the edge of settlements, applicants will be required to demonstrate that all sites in the adjacent centres have been investigated (eg Salisbury DC Local Plan Draft for Deposit, June 1998). Policies for attractions tend to favour their location within urban areas or settlements.

7.10 The review of the plans of those LPAs that stated that they did not have a general locational strategy specifically for tourism revealed that they did have broad locational strategies for all types of development. These usually encouraged development in existing centres and discouraged it outside the urban areas. In addition, some other LPAs had allocated sites for tourism uses only in central locations.

7.11 The objectives of the locational policies were often related to the need to protect the countryside or environmentally sensitive designated areas rather than the pursuit of the principles of PPG6 and PPG13. Although the policies of many LPAs favoured development within the urban areas, they did not refer to the preference for town centre sites or the accessibility of sites by non-car modes of transport. In their comments, some LPAs argued that some tourism uses were inappropriate for town centre sites and a number of LPAs favoured the development of derelict sites, with no reference to locational principles.

7.12 Relatively few authorities (25%) stated that they had policies relating to tourism uses that referred to the sequential approach to site selection in their emerging or adopted plans. Although 60% of London Boroughs and 40% of county councils stated that they had such policies, less than 20% of other LPAs stated this. These policies were primarily in emerging plans rather than adopted plans, many of which pre-date PPG6; over 80% of the 34 authorities whose emerging plans have reached an advanced stage stated that these do contain such policies. The review of a sample of plans indicated, however, that few of the plans containing these policies refer explicitly to tourism uses in the policy or the explanatory text. This finding is not unexpected, given the wording of PPG6 (see above 7.8).

7.13 From the evidence in the sample of plans it is often unclear whether such policies in plans are intended to relate to some or all tourism uses, or whether there is a scale threshold for the application of the approach. The review of planning applications and appeals (Chapter 8) suggests that there is some uncertainty concerning the interpretation of national as well as
local policy in relation to this issue.

7.14 Those criteria-based locational policies that do make explicit reference to tourism uses usually refer to hotel uses. For example, Policy CET7 of the Richmond upon Thames adopted UDP states that "Favourable consideration will be given to proposals for hotels and guest houses in suitable locations, which will normally be in or adjacent to existing commercial centres and well served by public transport."

**Transport/traffic policies**

7.15 The occurrence in adopted and emerging plans of policies relating to traffic and transport are set out in Table 7.3.

Table 7.3: Traffic and transport policies - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

7.16 Three-quarters of county councils and London Boroughs stated that they had policies in their plans referring to the traffic or transport impact of developments. These related to all types of development, rather than specifically tourist developments. In comparison, only 60% of the most rural LPAs and less than 50% of larger towns and cities and metropolitan boroughs stated that they had such policies. The review of development plans revealed that the older adopted plans often referred to the capacity of the road network as the criteria for assessing developments.

7.17 The review revealed that LPAs were increasingly including policies relating to accessibility by non-car modes of transport in their plans, and the majority of recently produced and emerging plans contained policies promoting travel-intensive uses at locations well served by public transport whilst discouraging it elsewhere. This conformed with the findings of the research on the implementation of PPG13 (see endnote 1). Few authorities, however, made clear whether such policies applied to tourism uses.

7.18 Half of all LPAs had policies referring to the public transport accessibility of sites; over 80% of London Boroughs and over 70% of county councils had such policies. However, few had developed detailed criteria for the assessment of the public transport accessibility of sites or locations. None referred to the contribution that can be made to social inclusion in urban and rural areas by focusing development in locations accessible by public transport, in order to benefit those without cars and from deprived areas issues raised in Draft Revised PPG13 (paragraphs 14, 16 and 26).

7.19 PPG13 stresses that LPAs should include policies in their plans that encourage and promote modes of transport other than the private car. Over 40% of LPAs stated that they have policies referring to accessibility by other non-car modes of transport eg cycle or pedestrian networks. Such policies are contained more frequently in the plans of the more urban LPAs. The review of a sample of plans revealed that a number of county councils (eg Leicestershire) are adopting the type of policies relating to access by pedestrians and cyclists and recommended in Draft Revised PPG13 (paras 52 to 57).

7.20 A review of transport policies and parking standards submitted by LPAs revealed that public transport accessibility was used more in relation to parking standards than as a criterion
for the location or form of development.

7.21 Policies relating to improvements to public transport infrastructure are increasingly being included in development plans in accordance with PPG13, and Draft Revised PPG13.

Parking policies and standards

7.22 80% of responding LPAs stated that they had parking policies or standards for hotel use in their adopted or emerging plans, or in SPG. Of those LPAs that had policies or standards, 60% set standards as minima, 26% as maxima and 14% had both.

7.23 All of the plans adopted before PPG13 (March 1994) expressed their standards as minimum requirements whereas 25% of policies or standards in those adopted after this were expressed as maxima or maxima and minima (in 43% of emerging plans and in 38% of supplementary planning guidance). Nevertheless, although more authorities are therefore incorporating the advice in PPG13, and that in the Revised Draft PPG13, the majority of LPAs continued to express standards as minimum requirements. For example, City of Westminster UDP (adopted July 1997) has a minimum requirement for hotels of one car parking space per ten bedrooms and one coach parking space per 200 bedspaces.

7.24 Although only 32% of LPAs had parking policies or standards for caravan or campsites, many have little demand for such development. Amongst rural LPAs and those LPAs reporting development pressure for such uses, over half of the respondents stated that they had parking policies and standards for these uses.

7.25 A surprisingly large percentage of LPAs (20%) stated that they had parking policies or standards for marinas and 40% had such policies or standards relating to attractions. For each use, almost 40% expressed parking requirements as maxima. However, an examination of the standards submitted suggests that the survey responses rather exaggerate the number of LPAs adopting detailed standards for some of the aforementioned uses. Although standards for hotel use were often given, standards for other tourism uses were usually grouped under one heading and did not reflect the very different characteristics of the uses concerned.

7.26 Half of the standards submitted that were adopted after PPG13 specify reduced requirements for parking for locations highly accessible by means of travel other than the private car. While this approach accords with the advice in the current PPG13, some of these LPAs have minimum standards and no restrictive maxima for less accessible locations (as found in Stage 1 as well). There was no evidence that authorities have been cautious in prescribing different levels of parking between town centres and peripheral locations, or that they were confident that the town centre would remain a favoured location for developers, as the Draft Revised PPG13 now advises. It is possible that setting such standards may create the "perverse incentives for development to locate away from town centres" referred to in the Revised Draft of PPG13 (paragraph 33).

7.27 Even amongst those authorities referring to maximum amounts of parking and expressing the desire to reduce car use or encourage a change of mode away from the private car, there remains a tendency to view the standard as an absolute requirement rather than a maximum level or restrictive ceiling which must not be exceeded. Some authorities state that they are willing to "relax" the "requirements" in accessible areas, but then require a commuted payment
for the failure to provide parking at the maximum permitted level. As levels are maximum levels, there can be no basis for seeking payments in lieu of parking that is not provided on site, as Revised Draft PPG13 notes (paragraph 65).

**General policies for tourism uses**

7.28 Most (85%) LPAs stated that they had general policies relating to tourism in either their adopted or emerging plan. All county councils had such policies and those authorities that were recognised tourism destinations were more likely to have them than authorities that were not. Many plans contained broad policies encouraging the provision of tourism development but expressed the need to balance the economic and social benefits of tourism with the need to protect the countryside, the environment generally and the amenities of residents in urban areas. This was particularly the case in areas designated as being of wildlife and landscape importance, or Green Belt eg Deposit Norfolk Structure Plan, 1998; Salisbury District Council Local Plan Draft for Deposit, June 1998.

**Table 7.4**: General policies for tourism - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

7.29 30% of all responding LPAs and almost half of the county councils stated that they had policies protecting some of the defined tourism uses. For example, the Cambridge Local Plan (1996) states that planning permission will not normally be granted for development leading to the loss of accommodation for visitors. It also states that planning permission will not normally be given for redevelopment leading to the loss of important attractions or important existing services, used by visitors especially in the central area.

7.30 Over 70% of county councils and over 50% of rural LPAs stated that they had policies discouraging tourism uses in particular areas. Less than a third of the LPAs in other areas had such policies. Policies discouraging tourism uses typically seek to discourage development outside existing settlements or to restrict certain types of development in sensitive rural areas such as Green Belts, National Parks and other designated areas of landscape and wildlife importance. In urban areas, some forms of development are discouraged in areas where such uses might harm residential amenity. Plans did not refer to the need to concentrate uses or improve accessibility as reasons for discouraging tourism developments from certain locations.

7.31 Policy T7 of the Lake District National Park Local Plan is one example of policy restricting certain forms of tourism development across the entire plan area. It states that "Proposals for the development of large-scale attractions or visitor facilities will not be permitted." Many other plans contain policies discouraging large-scale developments in the open countryside and particularly in areas with wildlife and landscape designations.

7.32 Other plans have policies that seek to prevent particular uses. The Vale Royal Local Plan has a policy presumption against proposals for new sites or the extension of existing sites for static recreational caravans; the Deposit Draft First Review contains a policy which states that such proposals "will not be allowed". Policy RT6 of the adopted local plan for Exmoor National Park states that permission will not be granted for new, or extended, caravan sites and chalet developments in the National Park nor for the conversion of touring sites to such uses.

7.33 Change to permanent residential use of new developments built as tourism
accommodation can be prevented by the imposition of occupancy conditions and over 35% of the most rural LPAs and LPAs with National Parks or AONBs within their boundaries stated that they had such policies. In contrast, only 12% of urban and metropolitan LPAs had such policies. Such policies relate, primarily, to static caravan and chalet sites. Control over the occupancy of hotels, in order to prevent residential occupation was a concern of some authorities, particularly in resort areas. Some LPAs had policies designed to prevent the loss of hotel uses but expressed concern over their ability to implement this effectively (see 9.22).

7.34 Almost 60% of London Boroughs stated that they have policies referring to the evening or 24-hour economy in their development plan, but less than 10% of other LPAs had such policies. (The 24 hour economy is ill-defined; it generally relates to the promotion and control of evening uses ie bars, restaurants and entertainment uses that contribute to the vitality of a town centre.)

7.35 A small percentage of respondents stated that they had other policies relating to tourism uses. Farm diversification was mentioned by two LPAs and the review of plans revealed such policies in the plans of many rural LPAs, although they were not always in the tourism chapter of plans. The Lake District National Park Local Plan states that one of the locations at which the use of land for the siting of touring caravans, motor caravans and for tented camping will be permitted is "on farms in connection with diversification proposals" (policies T16 and T17).

**Policies for specific tourism uses**

7.36 72% of LPAs stated that they had policies relating to hotels and/or bed and breakfast accommodation; only 35% of metropolitan boroughs but at least three-quarters of LPAs in all other categories and types of area.

Table 7.5: Policies for specific tourism uses - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

**Hotels**

7.37 The nature of these policies varied. In many areas facing development pressure for hotels, plans contained policies for the protection of hotels or B&Bs as well as policies to encourage hotel development within the existing urban area and restrict it in designated areas. For example, the 1994 adopted local plan for Bridgnorth District states "the building of new hotels and motels will not be permitted in the Green Belt except in very special circumstances. Outside the Green Belt they should normally be located within existing settlements (policy TM8)". Cambridge City Council and Westminster City Council are examples of LPAs with policies designed to resist the loss of visitor accommodation either throughout the plan area or in particular locations.

7.38 Few plans had policies stating that the sequential approach should be applied to hotel development, although a small number stated that hotels should be located on sites accessible by public transport (see 7.7 et seq).

7.39 Policies relating to the change of use of residential accommodation to tourism accommodation varied. LPAs in areas of housing shortage, such as London, were usually
concerned to prevent the loss of housing. In contrast, some authorities in tourist areas with less acute pressures for housing had policies encouraging hotel or B&B accommodation, sometimes restricted to particular locations, in order to meet future need and assist the local economy. Most policies relating to visitor accommodation stressed the need to avoid loss of residential amenity.

**Conference Facilities**

7.40 A quarter of LPAs had policies relating to conference facilities. The review of plans revealed that a number acknowledge the importance of business tourism. For example, the City of Southampton Local Plan (1995) states that one of the ways that it will assist in the expansion of the tourism role of the city will be to permit proposals for the expansion of the city's hotel and conference facilities. The 1997 Northampton Local Plan states that "Where appropriate, the Council will encourage the provision of hotel and conference facilities in the town having regard to their potential benefit for tourism" (para 7.137). East Hampshire Local Plan, First Review states that "Proposals for small-scale conference facilities will be permitted in certain circumstances" (Policy RT18).

**Touring caravans, camping sites and other self-catering accommodation**

7.41 Almost 90% of the most rural LPAs had policies relating to touring caravan or campsites in their adopted and emerging plans, and almost 70% had policies for static caravan sites and other self-catering accommodation. Over half of all other LPAs (except the metropolitan and London Boroughs) had policies relating to the former use and over 40% had policies relating to the latter uses.

7.42 The review of plans revealed considerable variations in the nature of policies relating to caravan uses. Policies relating to designated areas were particularly restrictive. For example, the Exmoor National Park adopted Local Plan (1997) states that permission will not be granted for new or extended sites for touring or static caravans and that permission for tented campsites will be granted only if they are small-scale, outside the Coastal Zone, cause no harm to the landscape or the local area (Policies RT6 and RT7).

7.43 The Lake District National Park Local Plan states that permission will not be granted for new holiday chalet sites (Policy T14), and that permission for the use of land for siting touring and static caravans and tents will be permitted only within the boundaries of approved sites, or on farms in connection with diversification proposals and where there is no adverse impact on the landscape or road conditions (Policy T9 and T16). "Campsites must be small-scale, satisfy the aforementioned requirements and in locations well served by public transport or catering primarily for campers travelling on foot, by bicycle or by horse" (policy T17).

7.44 In some other designated areas, policies relating to the development of sites for chalets, caravans and tented accommodation are equally restrictive. Salisbury District adopted Local Plan (1996) states that "Proposals which would result in a net increase in holiday chalet accommodation, or in the number of pitches for residential caravans, static holiday caravans, touring caravans and tents will not be permitted in the New Forest Heritage Area" (Policy HA16). Such policies might be expected to apply to this area, as since 1994 it has been subject to the same policies as National Parks; however, restrictive policies are applied also to
other national and locally designated areas. Bridgnorth District Council, for example, will not normally grant permission for new or extended caravan camping or chalet sites in the Severn Valley or in the Shropshire Hills AONB (Policy TM2).

7.45 In non-designated areas, policies relating to caravan, holiday chalet and campsites varied from those seeking to encourage new developments to those seeking to resist new developments. Richmond upon Thames state that they will give favourable consideration to proposals for camping and caravan developments in suitable locations (Policy CET10). Derbyshire and Leicestershire County Councils state that provision will be made for static and touring caravan sites and camping sites subject to environmental and traffic impact (Leisure and Tourism Policy 5 and Leisure Policy 5 respectively).

7.46 Many LPAs have adopted an approach which is more restrictive towards static caravan sites, chalet sites and other purpose built tourism accommodation than it is towards touring caravan sites and campsites, primarily because of the year-round nature of the visual and other impacts and effects. Salisbury District Local Plan Replacement Draft for Deposit (1998) states that proposals for static caravans and permanent holiday accommodation will not be permitted in the open countryside unrelated to existing settlements (Policy T7). The policies relating to touring caravan sites and campsites are less restrictive, allowing small-scale sites in the AONB provided they would not harm the landscape, and elsewhere permitting well-screened new sites within or adjacent to new settlements or adjacent to the main holiday routes. Some LPAs have identified specific sites for caravan or chalet sites in their plans.

7.47 A concern expressed in several plans is the occupation of static caravan and chalet sites as permanent residential accommodation. Such sites are often considered costly to service and relatively isolated from public service infrastructure. In addition permanent residential occupancy may conflict with nature conservation interests. Over a third of authorities in rural and designated areas had policies relating to the imposition of occupancy conditions to prevent permanent residential use of caravans and other self-catering accommodation.

7.48 Policy T10 of the Lake District National Park Local Plan provides an example relating to occupancy conditions for static caravans. "In those instances where permission is granted for an extension or amendment of the occupancy period, conditions will be imposed to ensure that the caravans are not used otherwise than for short-term holiday accommodation and to ensure that a specified minimum period remains during which the caravans will not be available for occupation."

7.49 Most LPAs have policies to resist the loss of existing sites and to seek to improve the appearance of existing sites eg Bridgnorth District Local Plan 1994, Policy TM4.

Attractions

7.50 The majority of authorities stated that they had policies relating to attractions. There were no significant geographical variations but plans covering recognised tourism destinations were more likely to have policies for attractions than were the plans covering other areas.

7.51 Many plans contain policies encouraging new and extended tourism attractions in order to diversify the tourism economy, provided they are of a suitable scale. In addition, a number of
plans had policies designed to discourage the loss of existing attractions.

7.52 A number of plans identified specific sites for the development of attractions or identified particular types of development that would be encouraged or supported. For example, South Tyneside Deposit Draft UDP stated that planning permission for the development of tourism and visitor attractions will be granted in appropriate locations and specified three sites where such development would be encouraged and supported (Policy ED10).

7.53 Northampton Local Plan (1997) states that "subject to compliance with other policies in the Local Plan planning permission will be granted for development which includes tourism attractions appropriate to the site or complementary to existing tourism facilities in the area" (Policy L28). It states that the Council will encourage the development of a National Fairground Museum and support the establishment of the National Shoe Museum. Barking UDP states that the Council will seek to secure a site or buildings for a heritage centre, museum or gallery (Policy AT1).

7.54 In rural areas, and particularly in National Parks and other designated areas, policies generally discourage the development of large-scale attractions eg the Lake District National Park Local Plan. The East Hampshire District Local Plan, First Review (1998) states that major developments such as theme parks and residential holiday villages will not be permitted where they would adversely affect the character, quality or appearance of the District (Policy PT14). The explanatory text states that such uses are unlikely to be suitable.

7.55 Proposals for smaller-scale attractions in rural areas are treated more sympathetically in plans, although many of the reviewed plans suggested that such developments should, whenever possible, use or adjoin existing buildings. Cotswold DC state that visitor attractions will be acceptable, in principle, as part of a farm or estate diversification scheme, within the boundaries of a Principal Settlement and exceptionally elsewhere, but only if certain conditions are met ie they have an affinity with the area, they are well related to the main tourism routes, as far as possible they use existing buildings and they do not significantly affect the character and appearance of the surrounding area.

7.56 Some urban LPAs facing significant pressure have policies restricting the development of new attractions. The Cambridge Local Plan (1996) encourages more diverse and dispersed attractions in order to relieve the pressure on the most congested areas of the city (cf Cambridge case study). However, it states that permission will not be given for new attractions that will draw additional visitors to the city unless they meet an established local or national need (Policy TO10). The Plan states that the Council will generally resist projects such as theme parks and heritage experiences.

7.57 Few of the plans reviewed had policies relating to marinas or other developments on waterways. Hinckley and Bosworth DC Local Plan (1995) states that planning permission for marinas and other commercial developments adjacent to the canal will be granted in appropriate locations provided various criteria relating to conservation, nature conservation and rural character are met (Policy REC8). The Wychavon District Local Plan (1998) states that marinas will not normally be allowed outside urban areas (Policy TR12).

7.58 The review of plans revealed that a number of LPAs in rural areas had policies designed to improve the attraction of areas to tourists by the maintenance or creation of long-distance
footpaths and bridleways, the improvement of signage and improvement or development of visitor information centres.

Site allocations

7.59 65% of LPAs producing local or unitary plans had allocated sites in their plans for tourism uses. 55% had allocated sites for a single tourism use, 21% for a range of tourism uses and 36% for a mixture of uses including tourism. Emerging plans were marginally more likely to contain such allocations than adopted plans. There was little variation between LPAs that were traditional tourism destinations and those that were new, emerging destinations (mainly urban centres) or not recognised as such.

Table 7.6: Site allocations - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

Hotels

7.60 The tourism use for which sites had most frequently been designated was hotel use; 43% of LPAs had allocations for such use in their plans. Regional variations were evident; almost all LPAs in London and two-thirds of LPAs in the Northern region made such allocations, compared with less than 20% in the North West and Yorkshire and Humberside. Allocations were more common in larger towns and in London than in rural areas and small towns. Those LPAs stating that they were facing development pressure for hotels were only marginally more likely to have allocated sites for such use.

7.61 The review of development plans revealed that when sites had been allocated for hotel use they were usually within the urban area. For example, the Milton Keynes adopted Local Plan (1995) had allocated seven sites in Milton Keynes City for new hotels and visitor accommodation (Policy LR18).

Caravan and camping sites

7.62 Although only 15% of LPAs had allocated sites for camping or caravan use in their adopted or emerging plans, over a third of the most rural LPAs had done so. For example, Cotswold DC will permit proposals for holiday chalets or lodges and permanent static holiday caravan sites within the Cotswold Water Park (Policy 37). Not surprisingly, few urban LPAs had included such allocations in their plans, although the Northampton Local Plan states that permission will be granted for a caravan and camping site on the western side of the town subject to it being acceptable in terms of its visual, environmental and traffic impact.

Attractions

7.63 A quarter of LPAs had allocated sites in their adopted or emerging plans for attractions. Such allocations were made in the adopted or emerging plans of over 40% of the non-metropolitan cities and urban areas and London Boroughs but in less than 20% of the plans of smaller towns and metropolitan boroughs. LPAs that are emerging tourism destinations were more likely than recognised tourism destinations to have such designations.
Other tourism allocations

7.64 Some 15% of LPAs had allocated sites in their plans for other single tourism uses and 21% had allocated sites for a mixture of tourism uses. Tourism uses were included in sites allocated for a mixture of uses by over a third of all LPAs. The LPAs most likely to have made such allocations were urban and metropolitan.

Planning Agreements (see endnote 2)

7.65 Few of the plans reviewed stated their intention to use planning agreements in relation to tourism developments although a number referred to their intention to use such agreements for all forms of development. References were made to a range of purposes for such agreements: to secure funding for infrastructure, for public transport improvements, or for improvements to facilities for cyclists and pedestrians.

Development briefs and other Supplementary Planning Guidance (SPG)

7.66 Some 19% of LPAs had prepared committee approved development briefs that included tourism uses. Few LPAs stated in plans their intention to prepare such briefs for tourism sites although a number sent copies of planning or development briefs with their response to the survey. The guidance varied considerably in its level of detail. Burnley DC was one of the few LPAs to state its intention to prepare planning briefs for sites allocated for tourism uses. Two such sites were identified in their 1991 Local Plan.

7.67 Only two LPAs had prepared non site-specific SPG relating to any of the specified tourism uses although 15% stated that they had prepared supplementary planning guidance for town centres.

Tourism strategies

7.68 Almost 60% of respondents had tourism development strategies prepared internally or by others (see endnote 3). Over 70% of LPAs covering recognised tourism destinations and over 65% of rural LPAs had prepared such strategies; they had been prepared by only 50% of London Boroughs and less than 40% of metropolitan boroughs.

7.69 Most LA tourism strategies focus on market issues but many also feature development opportunities. Reference is usually made to sustainability issues and proposals are usually set in the context of prevailing planning policy eg Croydon Tourism Strategy, Hillingdon Hotel Strategy. Very few had been adopted as SPG.

7.70 In the context of PPG21, only 11% of respondents had a visitor management plan, although more than a quarter of the LPAs with recognised tourism destinations had such plans. Visitor management is, however, often included as a topic in an LPAs tourism development strategy.

7.71 In the context of PPG6, over a third of non-county authorities have prepared town centre strategies. Most of these acknowledge the importance of tourism and/or leisure to the vitality and viability of the town centres and encourage a broad range of uses. Most include
references to planning for tourism and leisure developments and some identify sites for tourism uses that could be included in development plans, as PPG6 advises. However, many of the documents contain broad guidance on matters that could not easily be incorporated into development plans and several are primarily promotional documents designed to attract investment.

**Site assembly and assistance with funding**

7.72 PPG21 states that plans should consider opportunities to utilise tourism as an element in urban regeneration (para 4.14). One of the means by which LPAs can help to facilitate development is by assisting with the assembly of sites. Nearly 30% of LPAs stated that they had facilitated the assembly of sites for tourism developments or for developments including a tourism component. Such action was most frequently reported by the larger urban and metropolitan LPAs. 60% of LPAs that had assisted with the assembly of sites, and 30% of all responding LPAs, had undertaken such action in relation to developments including attractions, museums, heritage sites etc. Only 7 out of 157 LPAs (4%) had helped with the assembly of sites involving hotel development.

7.73 Over 40% of LPAs had granted permission for a council's own development for tourism use in the last five years. Of these developments, 80% were for developments involving attractions, museums, heritage sites etc and 20% for hotels. The majority of these developments, other than the hotels, received funding from external sources. The main sources of external funding were the lottery and the EU. Lottery funding was received for approximately half of the developments and ERDF funding was received for approximately a quarter of the schemes mentioned.

**Summary of key issues**

7.74 PPG21 advises LPAs to undertake background work necessary to identify future trends in tourism and their implications. Issues that need exploring include:

- what the potential benefits of such work are and how to encourage LPAs to undertake it; and
- whether tourism is given sufficient weight and depth in development plans.

7.75 Sustainable development principles underpin the locational policies in PPGs 6 and 13. There are specific issues about how planning policies for tourism should reflect these principles in relation to the different requirements of the main individual tourism land uses hotels, caravans and attractions; and whether specific site allocations should be made for tourism.

7.76 In relation to rural tourism development, key issues include how to assess and balance social and economic benefits with the need to protect the countryside, particularly in sensitive and designated areas; and how plans should deal with development of small-scale tourism development, eg conversion of redundant buildings for tourist accommodation.
Key strategic issues have also emerged, such as what importance LPAs should give to tourism strategies that incorporate wider visitor management and impact mitigation measures; and whether LPAs should seek to protect tourism uses in areas of decline or rapid market change, such as traditional resorts.

Endnotes
1. DETR (1997) op cit
2. See Appendix V.
3. In the CBI report, Building Tourism Together, 1996, 74% of local authorities claimed they had a tourism strategy.
8. Planning For Tourism: Development Control And Appeals

Introduction
8.1 This chapter considers the results of the LPA survey that relate to development control and the results of desk research into a sample of tourism related planning appeal decisions.

Background work and liaison with the tourism industry
8.2 Less than 10% of authorities reported that they had undertaken surveys of existing facilities, liaison or consultation with the industry, or research into the effects of tourist uses in response to planning applications received. Although such work was more likely to have been undertaken in the preparation of development plans, the majority of authorities were not undertaking such work at either stage of the planning process.

8.3 Almost a third of respondents had received or required transport or traffic impact statements relating to major new or extended tourism developments. All except two of the authorities providing details stated that the statements related to traffic impact and highway issues such as junction capacity, access or the effect on trunk roads. Only one authority stated that they covered issues relating to non-car modes of transport. Only two responding authorities had required air quality studies.

8.4 Less than 10% of authorities had received statutory environmental impact statements, although an additional 15% had received environmental impact statements that were not statutorily required. Few authorities explained the circumstances in the latter cases.

8.5 20% of the 102 authorities responding to this question had undertaken demand or needs studies relating to applications for major developments. Again, few authorities provided any elaboration, although one stated that the applicants were required to demonstrate the viability of the scheme and the benefit to the local community.

Examples of applications for major new or extended tourism developments
8.6 92 of the 139 non-county authorities gave examples of tourism applications dealt with over the last two years; 161 examples were given.

Table 8.1: Types of development - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

8.7 The developments listed in Table 8.1 are categorised by the main tourist uses in each development. Many of the developments contained other uses as well as the one listed. For example, almost 20% of all developments included A3 uses, retail use was included in twelve of the applications and housing in seven. Those uses most frequently cited, and their locations, are set out in Table 8.2:

Table 8.2: Uses included in the examples of applications, by location - available from the
8.8 Although the sample may not be representative of all applications, it indicates that applicants often seek out-of-centre and open countryside locations for all types of use, and not merely for those uses that are dependent on precise locations such as heritage sites. Over half of the hotel, conference centre and theme park/attraction applications in the sample were for out-of-centre or open countryside locations.

**LPA decisions**

8.9 Of the 161 cases, 102 had been determined by the LPAs; of the 16 refusals, 7 had been determined at subsequent appeals. An additional 8 applications had been the subject of appeals against non-determination, were the subject of call-ins, or were subject to appeals against refusals that were not noted by the respondent (1 dismissed; 1 allowed; 6 pending/unknown). The remainder of the cases given as examples were awaiting a decision (32), had been withdrawn (4), or the decision was not supplied (15). The decisions are tabulated below according to the location of the development.

**Table 8.3**: LPA decisions by location of examples - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

8.10 The LPA approval rate of the sample (84%) is similar to that for all applications (88% of major applications were approved in the second quarter of 1998) (see endnote 4).

8.11 The small number of cases refused permission (16) and the nature of the sample (self-selected by respondents) makes it difficult to draw meaningful conclusions about the nature of developments refused by LPAs. However, in the examples given there was a much higher refusal rate for developments in the open countryside than for town centre and edge-of-centre developments.

8.12 Almost a third of the examples of developments in the open countryside on which decisions had been made were refused permission. Most of these related to hotel or caravan developments. Almost half of the determined applications for hotels in the open countryside were refusals, whereas there were no examples given of refusals for town centre applications for hotels. Amongst the examples given of edge-of-centre and out-of-centre hotel applications, only one in each location was refused permission. The main issues in the refusals of hotel developments were residential amenity in the cases in urban areas, and the location in a designated area (Green Belt or AONB) for those in the open countryside. A Green Belt location was not, however, prohibitive for hotel developments; five of the seven examples of applications for hotel developments in the Green Belt were approved.

8.13 The examples given of refusals of permission for caravan development were all for sites in locally or nationally designated areas (National Park, AONB and Landscape Area). No examples were given of approved caravan developments in National Parks, however two examples were given of approvals for caravan sites in AONBs.

**Main issues considered by the local authorities in the applications**
8.14 Authorities were asked to summarise the main issues relating to each of the examples of major applications that they gave. The main issues were listed for 143 of the applications. The issues raised by the respondents are set out in Figure 8.1.

Figure 8.1: Proportion of applications in which main issues were raised - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

**Highways and traffic issues**

8.15 Figure 8.1 shows that highway and traffic issues were considered important in over a third of those examples for which authorities listed the main issues, although they were raised in only 2 of the 16 refusals. Such issues were raised in relation to half of the out-of-centre examples, but in less than a quarter of the town centre and open countryside cases, and in only a slightly higher proportion of edge-of-centre examples.

8.16 Traffic and highway issues were raised in relation to over three quarters of the applications for caravan sites and half of those relating to museums and galleries. It was mentioned in one quarter of the examples of hotel development.

**PPG13 and 6 and locational issues**

8.17 Issues relating to PPG13 and PPG6 such as the impact on the vitality and viability of town centres, out-of-centre locations, public transport accessibility and the sequential test, were mentioned as issues in over 20% of the examples. They were mentioned primarily in relation to hotels but also in relation to a small number of attractions, museums and visitor centres. In only two of the cases in which such issues were mentioned were the applications refused.

8.18 These issues were mentioned in relation to a quarter of the examples of hotel development, but only in relation to 2 of the 27 examples of hotels in the open countryside. Whilst they were listed as amongst the main issues in relation to a third of the out-of-centre hotel developments, in only one of these cases was permission refused; in contrast, 12 were approved. In relation to attractions, these issues were mentioned only in relation to edge-of-centre sites.

8.19 Some of the considerations in PPG6 and PPG13 are not always of relevance to tourism uses. Not all uses are footloose and not all are major generators of trips. Tourism uses are not explicitly mentioned in relation to the sequential approach, and national policy for tourism uses is a criteria based approach to preferred locations. Draft Revised PPG13 implicitly recognises some developments may need to be located near to existing buildings, monuments, physical features or landscapes and in locations not well served by public transport, when advising authorities to consider whether proposals need to be in such locations.

8.20 Accessibility by modes of transport other than the private car was included as one of the main issues in relation to only eight of the examples - 6 hotels and 2 visitor centres. Five of these were in out-of-centre locations, two in town centres and one in the open countryside. All of those on which decisions have been made were approved.

8.21 In the examples of permitted applications given, it appears that the authorities considered
either that:

- the sites were accessible by non-car modes of transport;
- that the developments would cause no harm to the vitality and viability of the town centre and that there were no other more centrally located sites available; or
- that the issues of location and accessibility were considered to be outweighed by other factors.

8.22 The failure of many authorities to refer to these issues, particularly in relation to out-of-centre developments and developments in the open countryside, suggests that there is some uncertainty about their relevance to many of the tourism uses. Further weight is given to this view by the finding that only 7% of respondents stated that they were undertaking research into the planning effects of tourism uses in their preparation of development plans and only 5% were doing so in relation to planning applications for tourism uses.

**Pressure on designated and sensitive sites**

8.23 The survey revealed that the majority of authorities are taking account of national policy. LPAs are considering the impact on sensitive locations as a main issue in applications for developments in designated and other sensitive areas of the open countryside. The effect of developments on the character or appearance of nationally and locally designated areas such as Green Belts, AONBs, National Parks, SSSIs etc and on the character and appearance of open countryside was cited as a main issue in 40% of the examples and in more than three-quarters of the examples for developments in the open countryside.

8.24 The effect of developments on the character and appearance of sensitive areas was mentioned in relation to all of the applications for developments in AONBs, SSSIs and almost all of those in locally designated areas of landscape or wildlife importance. Rather surprisingly, it was mentioned in less than half the examples of developments in National Parks and only half of those in the Green Belt. (LPAs may not, however, have listed this issue if they felt that merely citing the designation in the site description implied acknowledgement of its importance.)

8.25 The issues were mentioned in relation to half of the 16 applications that were refused. However, this amounts to only 20% of the examples which had been determined by authorities and in which these issues were cited. The refusal rate for such applications is, therefore, little different from that of the whole sample. Ten of the thirteen examples of hotel developments in such areas were granted permission and three of the six campsites.

8.26 From this limited number of examples given by LPAs, it appears that restrictive policies for these areas are being applied with a degree of flexibility.

**Economic benefits and regeneration**

8.27 Government policy stresses the contribution that tourism makes to the national and local
economies. The economic benefits of developments were cited as main issues in relation to one third of all examples of major new or extended developments, and more than 30% of those examples approved by authorities. They were listed as main issues in over a quarter of the approvals, and half of hotel developments, in out-of-centre and open countryside locations. This indicates that employment benefits may be used by authorities as a reason for relaxing or overriding PPG6, PPG13 or PPG7 issues.

8.28 They were mentioned as main issues in over half of the applications relating to hotels in out-of-centre and open countryside locations and in more than 20% of the approvals given for developments in sensitive areas. In only two of the sixteen examples of refused applications were the economic benefits of a development mentioned as an issue; however, this may be because authorities tended to identify the main determining issues rather than all relevant issues.

8.29 An additional indication of the weight given to the economic importance of tourism uses is the number of examples of tourism developments that were granted permission on sites allocated for other employment uses. The allocation of sites for employment use was cited as a main issue in 10% of the examples, but permission was granted in all those cases that had been determined.

**Design and conservation**

8.30 Design and conservation issues were listed as main issues in relation to 27% of the examples. Such issues were raised in relation to 5 of the 16 applications that were refused permission by LPAs and in 22 of the applications that were approved. General design issues or the impact on the character of a village were the main design issues raised in refusals rather than impact on conservation areas or listed buildings. In several of the examples, LPAs listed the benefits to listed buildings or historic houses and parklands which would be gained from restoration or re-use as a main issue.

**Residential amenity**

8.31 The effect of developments on residential amenity was mentioned as a main issue in 10% of the examples and two of the applications that were refused permission and an additional two of those subject to appeal.

**Other issues raised by LPAs**

8.32 The scale of the extension was mentioned as an issue in relation to 17% of the cases. In most of these cases, design issues were raised also; it would appear therefore that it was the scale of the scheme rather than traffic generation or other effects that was the factor in most of these cases.

8.33 Rather surprisingly, occupancy issues were listed as main issues in relation to less than 5% of the examples of planning applications. Occupancy issues appear to be more of a concern in relation to *existing* developments (ie enforcement of breaches of planning control) rather than new applications or appeals.
8.34 Very few authorities mentioned that a conflict with the plan was a main issue; for example, most hotel developments on employment sites were viewed positively.

**Planning obligations (see endnote 5)**

8.35 Of the tourism applications cited, respondents noted that Section 106 agreements had been completed in relation to 31 (20%) of the examples. Agreements were reported more frequently in the most rural areas and in metropolitan and London Boroughs. In response to a separate question, approximately 20% of LPAs stated that they had entered planning obligations or other legal agreements in relation to applications for the specified tourism uses. There was little variation between the response from authorities in each category and geographical location.

8.36 Where details of these legal agreements were given, in response to either question, they normally related to highway works. Two thirds of the respondents stated that they had entered agreements relating to highway works, agreements relating to any other single aspect or effect of developments were mentioned by fewer than a third of authorities. Six LPAs mentioned agreements relating to environmental works and five mentioned agreements designed to secure public access to facilities. Only two authorities stated that they had entered agreements designed to control the use or occupancy of the development and only one had entered an agreement securing funding for public transport.

**Analysis of tourism appeal decisions**

8.37 An analysis was carried out of a sample of appeal decisions relating to hotels, tourist attractions, caravans and camping, and holiday dwellings issued between June 1996 and early March 1999. The sample comprised all decisions made after inquiries and hearings, but no cases dealt with by written representations. Less than 20% of all appeals are dealt with at inquiries and hearings, and it is primarily larger developments that are dealt with in this way. Certain types of appeal are therefore underrepresented in the sample.

8.38 Table 8.4 shows the breakdown of appeals allowed and dismissed within the four main uses.

**Table 8.4: Appeals allowed and dismissed by main use - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.**

8.39 Almost 40% of appeals were allowed but the success rate varied between uses. Caravans and tents (28%) were the least, and attractions (55%) the most, likely to be allowed. However, sample sizes were small. The success rate of the largest group, hotels, is near the national average of one in three.

8.40 59% of all appeal sites were located in an area of statutory or non-statutory landscape or townscape value such as an AONB, National Park or conservation area. Appeals in such areas were less likely to be allowed (36%) than those outside (43%).

8.41 Table 8.5 relates planning appeal decisions on tourism proposals to planning issues identified by the Inspectors. These are similar but do not tally exactly with those identified by
the LPAs above.

Table 8.5: Planning issues in tourism appeals - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

8.42 When seeking a balance between policies, the main conflicts were those between the impact of schemes in environmentally sensitive areas and the need for additional facilities. However, a variety of other issues could be involved.

**Pressure on designated areas**

8.43 Many appeals related to sites in environmentally sensitive areas such as Green Belt, AONB and conservation areas. Inspectors were generally concerned to maintain the character and appearance of these areas and used national and local policies to guide them. For instance, "I am convinced that in this sensitive area it is important to apply the landscape protection and Green Gaps policies rigorously in order to protect this surviving rural character" (see endnote 6). A different conclusion was drawn in another hotel case. "In the particular circumstances of this case, the provision of high quality hotel accommodation would provide the benefits sought by the Development Plan and constitutes the very special circumstances which are necessary to outweigh the harm caused by inappropriate development and the limited harm to the Green Belt" (see endnote 7).

8.44 Inspectors were mindful of the need to preserve the character and appearance of the locations even if the area was not designated. For example, the conversion of a redundant barn into a museum was dismissed because the new access to the site detracted from the unspoilt entrance to the rural hamlet although the details of the barn conversion were acceptable (see endnote 8).

8.45 The impact of proposed holiday dwellings upon the character and appearance of the area was applied to both the design of holiday cabins which might "appear as an incongruous element in the local scene in the sense of being completely different to the local vernacular architectural style" (see endnote 9) and impact on the countryside (see endnote 10).

8.46 In a proposal for 29 lodges in four groups around a lake situated in an area of best landscape (see endnote 11), the Inspector was concerned with the views obtained by the general public rather than those who were using the site. Five lodges were refused because they would be visible from the entrance to the site. The other three groups were considered to fit into the landscape. In addition, the Inspector felt that the comprehensive proposals to enhance the appearance of the site as a whole must be weighed against any harm caused by individual elements of the scheme.

8.47 The impact of caravan sites upon the environment was an issue in many of the cases examined. This applied whether or not the proposed location was in an area of landscape significance such as an AONB or Green Belt. Concerns were expressed that the physical aspects of caravan sites the caravans, the hard standing, roadway, service points etc would conflict with their proposed locations (see endnote 12). Thus a site behind a public house would be "noticeably out of keeping" with the undeveloped rural setting (see endnote 13). Human activity associated with the caravans was also seen as contributing to a fundamental
change to "the nature of the land" (see endnote 14).

8.48 The need for, and problems of, screening sites arose in a number of cases (see endnote 15). Planted barriers were generally suggested but their suitability was not always accepted. In one case, the Inspector considered that an effective screen would have to be so dense and visually intrusive that it would itself be harmful to the area (see endnote 16). In a case where no detailed design was submitted (see endnote 17), the Inspector concluded that "Depending on the size of the trees planted the site could remain generally open for up to 10 years, and perhaps longer. During this time caravans and tents on the site would be unacceptably prominent and out of keeping with this rural area I conclude that this would materially harm both the countryside and the open agricultural landscape, contrary to Structure Plan policies".

8.49 The protection of individual buildings was also an issue. The Inspector considered that, although a proposal to convert and add to the Free Trade Hall in Manchester to create a hotel satisfied "the policies in the UDP on employment, economic development and regeneration", it failed those on "the preservation and enhancement of buildings and areas of architectural interest." Also, the Inspector considered the information presented at the Inquiry was inadequate in terms of PPG15s advice on listed buildings since it failed to establish whether or not there were other viable uses for the building (see endnote 18).

8.50 One of the few urban appeals for a change of use from shops/office to a Sherlock Holmes themed exhibition took a broad view of the likely impact of the proposal on the area (see endnote 19). The Inspector concluded that a change of use to tourism activity would materially harm the character and appearance of the locality. The Dorset Square Conservation Area, in which the appeal property was situated, was predominantly residential. The proposed change of use would lead to a substantial change in the areas character, erode an important local shopping frontage and lead to an area increasingly dominated by tourism.

**Traffic issues**

8.51 Traffic issues tended to be related to the impact of traffic on the network (see endnote 20) and safety matters rather than the more strategic concerns of sustainability and encouraging the use of public transport. For example, a proposal to increase the size of a rural attraction which already attracted 25,000 visitors a year was considered solely in terms of the capacity of the local road network (see endnote 21).

8.52 In another case (see endnote 22) the Inspector felt that PPG13 supported the development of a branded budget hotel. At the time of the inquiry, there was no such hotel accommodation in Chester so demand had to be met by hotels some distance away. The Inspector considered that "This situation does not appear to be compatible with the general thrust of national and local planning policies which seek to achieve more sustainable forms of development."

8.53 The sequential test was mentioned specifically in the Segensworth appeal when the Inspector remarked that, for a variety of reasons, it need not be applied. Hotels "are not one of the key uses for town centres mentioned in PPG6. Having a hotel of this type on the edge of town may well obviate the need for passing travellers to enter the town, thereby minimising car journeys and congestion.. Having a number of restaurants spread throughout extensive urban areas can reduce the need for long car journeys and would accord with the thrust of PPG13."
He noted that an hourly bus service passed the site on weekdays until about 6pm.

8.54 However, in two cases of hotels in the countryside (see endnote 23), Inspectors found that the location was unacceptable in policy terms ie the need to reduce use of the car. The Inspector at Heydon Grange noted that there might be savings in travelling for business visitors who could not find accommodation locally or for local companies who were enabled to hold conferences closer to their business. "But with no alternative means of travel, the development would not reduce reliance on the private car as sought in PPG13. Moreover, the hotel could also be a major generator of travel demand in its own right the development would be likely to be energy inefficient contrary to (structure plan) policy and to the principles of sustainable development and the objectives of the Governments policies for the integration of transport and land-use planning”.

8.55 One applicant argued that the special nature of their branded restaurant led to people travelling significant distances to them and that the provision of a new outlet would therefore reduce journey times. This argument was treated with caution by the Inspector, who noted "Leisure travel and public eating habits are likely to be too complex to allow such conclusions to be confidently drawn. It also seems more likely that the provision of an additional outlet serving primarily car borne customers would generate a net increase in car movements in the area." The proposal was within open countryside and was "clearly aimed towards a car-borne clientele" so "it was difficult to see how the proposals can be considered to be furthering the aims of these PPGs (6 and 13)” (see endnote 24).

8.56 Questions of sustainability and trip generation were discussed in some detail at two inquiries (see endnote 25). Watery Lane was a proposal to establish an arts park that was expected to attract up to 350,000 visitors a year. Despite the fact that there were two stations nearby and a significant number of visitors would arrive by coach, the Inspector thought it highly likely that the majority of journeys generated by the proposals would be made by car and that this was contrary to national and local policy. He also considered that "whilst the likely increase in traffic may not be such in itself to warrant withholding planning permission, it is a material consideration in my view that weighs heavily against the proposal."

8.57 Deli Farm was a proposed renewable energy education and demonstration centre in Cornwall referred to the SoS for decision. The Inspector accepted that it was essential that the centre be located adjacent to a wind farm so that wind energy could be seen in practice and in Cornwall all such farms were situated in the countryside. A town centre location would "make the centre much less attractive”. The proposed site did not conflict with either PPG13 or local policies since it was close to one of main concentrations of tourist accommodation and facilities in Cornwall; people were already in the area so the centre should not generate a large amount of additional mileage. Also, several bus services passed the site.

Tourism need and economic regeneration

8.58 The need for more hotel bed spaces was argued at a number of appeals. Need for, or a policy commitment to the provision of more bed spaces was not necessarily sufficient to justify allowing an appeal; the policy context was crucial. Inspectors usually weighed up the benefits of providing more accommodation against the impact on the character of the surrounding area. In Birmingham, the Inspector found that "the UDPs general encouragement of tourism encouragement of new hotels on major traffic routes identification of the employment potential"
etc could not outweigh the fact that the scheme was "at odds with (policies) which address the quality and enhancement of the built environment and the preservation of listed buildings" (see endnote 26). Harm to the character and appearance of an area was generally seen as greater than the need. One reason for this was that applicants failed to substantiate their case either because no information was produced or it was too general (see endnote 27).

8.59 The importance of policy guidance from Government and through the local planning framework was emphasised by Inspectors (see endnote 28). In Humberston, the Inspector noted "the proposal could contribute significantly to the local resort economy. However, such proposals are also required to comply with environmental considerations, which this proposal does not. There has been no proper evaluation to show that the economic benefits of the proposal could not be achieved elsewhere with less harmful consequences. The scheme is in conflict with important elements of the Development Plan, which are not outweighed by those factors advanced in its support".

8.60 Applicants and LPAs were expected to assess the options for meeting need. Where new hotels or extensions were proposed in Green Belt, Inspectors were generally concerned that all alternative options should be investigated (see endnote 29) and that the possibility of bringing forward new sites within the urban area be investigated. At the Stirrups Country House Hotel appeal, the Inspector noted the lack of information and remarked that there was "no decisive basis to conclude that all the options for providing further hotel accommodation outside the Green Belt (had) been thoroughly explored and ruled out." At Heydon Grange Golf and Country Club, Heydon, the Inspector noted that an accepted need had not been established.

8.61 On Metropolitan Open Land, however, a more lenient attitude was taken to a 30 bedroom budget hotel because of the benefit to tourism from the provision of badly needed accommodation. The Inspector added that design and screening would minimise any adverse effect on visual amenity (see endnote 30).

8.62 The Chester appeal was allowed on the grounds that "tourism is very important to the economy of Chester and, consequently, the loss of the appeal site for residential use should be balanced against the possible benefits of providing hotel accommodation within the City." Also, the proposal would further the aim of the Deposit Draft Local Plan to provide a range of hotels within the plan area.

8.63 Little mention was found of need for attractions apart from the Arts Park at Crowmarsh Gifford where the Inspector judged that although the Park could potentially fulfil a national and local function, that did not constitute an overriding need.

8.64 Job creation and economic regeneration were mentioned specifically in only a few hotel cases. At Rotherham, the Inspector concluded that a new 150 bedroom hotel "would probably bring a material boost to an already regenerating economy". However, not only were the benefits uncertain but the proposal site was only one of several possible hotel sites, all of which could boost the local economy, and its use entailed the "irrevocable loss of a valuable part of the Green Belt". The Inspector concluded that the balance was in favour of protecting the Green Belt (see endnote 31).

8.65 The Rushley Farm recreational facility with 4 full and 10 part-time jobs was considered by the Inspector to "make a contribution to the diversification of the farm economy" and the
Inspector gave considerable weight to the fact that the Deli Farm energy centre would create 27 jobs, and possibly more, in spin-off businesses.

8.66 Economic arguments were advanced at a number of caravan appeals but Inspectors generally found them outweighed by other factors, particularly the impact upon the environment and/or residential amenity (see endnote 32). The benefit of employment was also considered a possible 10 jobs at peak periods was reported to be of little significance when a proposed industrial development in the same area could generate 300 jobs (see endnote 33).

Residential amenity

8.67 When considering the impact of a proposal on residential amenity, local circumstances prevailed. Thus a small funfair at a holiday village was seen as "reasonably in keeping" with the environment but the Inspector did condition the approval to limit operating hours and noise levels in order that residents should not be disturbed (see endnote 34). The Inspector considered that the impact of even quite a small attraction on a rural hamlet could be unacceptable. At Homestead, Hopperton, the proposed museum was "likely to alter the quiet character of the hamlet and cause some unacceptable disturbance to residents by reason of noise and overall traffic movements". The inability of owners to control the number of visitors was also a concern "although the museum may not be open outside the limited hours proposed, it would clearly be difficult to prevent potential visitors driving to the site during the closed periods".

8.68 In considering the proposal for a seven year permission for the Garsington Opera Festival and additional events (see endnote 35), the Inspector balanced the issue of loss of residential amenity against the overall cultural, social, economic benefits to the village and those living further afield. The limited degree of disturbance to a small number of neighbours and the short duration of the Festival contributed to the acceptance of the proposal. (The Inspector noted the advice in PPG24 that the frequency of the noise and the level of disturbance should be balanced against the likely enjoyment created.)

8.69 Residents concerns about the impact of caravan sites included noise, visual intrusion and light pollution. Inspectors views varied. In some cases, they considered that objections could be dealt with through suitable planning conditions or a s106 agreement (see endnote 36). In others, the loss of residential amenity was a reason for dismissal (see endnote 37). At the White Swan, the Inspector remarked that "In warm weather it would not be unusual for noise to continue into the evening or later which, in my opinion, could be particularly distressing." However, an extension to allow winter occupation was seen as unlikely to cause unacceptable levels of disturbance since, at that time of year, noise from childrens games would not be significant and adults would be engaged in quiet activities such as gardening and walking (see endnote 38).

Other issues raised in appeals

8.70 The Inspector considered the impact of a proposed 40 bedroom travel lodge on Evesham town centre and found that the evidence presented was of limited value and concluded that "whilst the proposal would have some impact on the town centre it would not be sufficient to
justify refusal" (see endnote 39).

8.71 Inspectors were not supportive of proposals for caravan parks on high quality agricultural land. A scheme on grade 2 land was dismissed as contrary to the Development Plan and MAFF policies to safeguard such land for future use. "The development would degrade the land irreversibly, its value as a national asset lost (sic) and the interests of agricultural sustainability jeopardised." (see endnote 40)

8.72 Issues regarding the extension, or lifting, of seasonal occupancy restrictions fell into two main categories; concerns about the impact of extended use upon birds over-wintering on adjoining estuaries, lakes etc and the potential for permanent occupation. Inspectors concerns about permitting year round use can be seen in the Manor Farm appeal where the Inspector noted that "the domestic paraphernalia normally associated with residential occupation, such as sheds, fences, clothes lines and cultivated areas" could grow up and cause visual intrusion. He was also concerned that winter occupation could lead to pressure on the local authority to provide additional facilities which it would have difficulty in resisting. (Inspectors attitudes to the need to protect over-wintering wildfowl varied according to local circumstances.)

8.73 In the cases reviewed, Inspectors made little distinction between the impact of static and touring caravans. One exception was a proposal to replace touring caravans with statics. The Inspector accepted this with conditions because of the various benefits that would arise. These included "improvements in the appearance of all the vans permitted on the appeal site throughout the year, a reduction in the total number of static and touring vans permitted on the caravan park, the removal of some caravan traffic from the roads in the immediate locality (especially in the peak season), and improved landscaping. With more static vans on the land, facilities such as the clubhouse and the shop should be open for a longer season, which would strengthen the sites appeal and thereby benefit the economy of the locality" (see endnote 41).

8.74 In an appeal for a change of use from tent area to a site for, among other uses, caravans, the Inspector noted that the difference between the visual impact of touring caravans and tents was becoming blurred as tents grew in size. He therefore took the view that adding touring caravans to the current mix of motor caravans and tents need not have a substantial impact on the appearance of the site (see endnote 42).

Summary of key issues

8.75 As with the leisure study, a key issue arising from scrutiny of tourism applications and appeals is whether planning decisions are consistent and comprehensive in their consideration of planning policy guidance, and whether there are areas of inconsistency that suggest the need for clarification. There appears to be uncertainty about the relevance of PPGs 6 and 13 to tourism land uses.

8.76 The survey also highlights questions about what background evidence is reasonably required to support tourism planning applications. For example, how should the impacts and local benefits of schemes be tested? Similarly, what weight should attach to different factors, such as economic benefits in environmentally sensitive areas? Whilst planning authorities were clearly using their policies to influence the location of tourism land uses, questions were raised as to when national policies applied, and whether the locations for development were always
appropriate.

**Endnotes**

5. See Appendix V
6. Reading Moat House Hotel, Earley, dismissed 9.97
7. Forte Posthouse Hotel, Brentwood, allowed 10.98
8. Homestead, Hopperton, dismissed 7.96
9. Blacksmiths Arms Hotel, Hoptoft, dismissed 10.98
10. Peacock Inn, Boraston, dismissed 2.98
11. Buckden Marina, Offord Cluny, allowed 7.97
12. White Swan Inn, Dunham on Trent, dismissed 4.97; Lyme View Marina, Adlington, dismissed 3.98
13. Greyhound Inn, Staple Fitzpaine, dismissed 3.97
14. Holdens Farm Caravan Park, Bracklesham Bay, dismissed 8.97
15. Trenton Lodge, Fenton, dismissed for other reasons 9.96; Hogbarn Caravan Park, Harriestham, allowed 6.97; Manor Farm, Harmondsworth, dismissed 9.97; Frating Road, Great Bromley, dismissed 10.97; Lower Yalberton Holiday Park, Paignton, allowed 10.97
16. Manor Farm, Harmondsworth, dismissed 9.97
17. Frating Road, Great Bromley, dismissed 10.97
18. Free Trade Hall, Manchester, dismissed 10.98
20. Forte Posthouse, High Wycombe, dismissed 2.97; Segensworth Industrial Estate, Segensworth, dismissed 7.98; Three Jolly Wheelers, Chigwell, dismissed 10.98; Myllet Arms Public House, Perivale, allowed 2.99
21. Farmer Giles Farmstead, Teffont, dismissed 10.96
22. Caldy Valley Road, Chester, allowed 7.98
23. Pond Cottages, Canterbury, dismissed 5.97; Heydon Grange Golf and County Club, Heydon, dismissed 10.98
24. Former Paybody Hospital, Allesley, dismissed 2.98
25. Watery Lane, Crowmarsh Gifford, dismissed 8.97; Deli Farm, Delabole, allowed 2.98
27. Beacon Field, Sampford Courtney, dismissed 11.96; Blacksmiths Arms Hotel, Hoptoft, dismissed 10.98
28. South Sea Lane, Humberston, dismissed 7.96; Capel Court Country Club, Capel Le Ferne, dismissed 9.97
29. Park View Farm, Heywood, dismissed 11.96; Stirrups Country House Hotel, Winkfield, dismissed 12.96
30. Myllet Arms Public House, Perivale, allowed 2.99
31. Land adjoining M1 Junction 31, Aston, dismissed 1.97
32. Greyhound Inn, Staple Fitzpaine, dismissed 3.97; Trenton Lodge, Fenton, dismissed appeal against enforcement notice 9.96
33. Green Lawns Caravan Park, Selsey, dismissed 7.97
34. South Shore Holiday Village, Wilsthorpe, allowed 1.99
35. Garsington Manor, Garsington allowed. 2.97
36. Frating Road, Great Bromley, dismissed for other reasons 10.97
37. Trenton Lodge, Fenton, dismissed appeal against enforcement notice 9.96; White Swan Inn, Dunham on Trent, dismissed 4.97; Holdens Farm Caravan Park, Bracklesham Bay,
dismissed 8.97
38. Seaview Holiday Camp, West Mersea, allowed 1.97
39. Twyford Farm, Evesham, allowed 10.96
40. South Sea Lane, Humberston, dismissed 7.96
41. Tencreek Caravan Park, Looe, allowed 7.96
42. Yalberton Holiday Park, Paignton, allowed 10.97
9. Planning For Tourism: Public/Private Sector Perspectives

Introduction

9.1 This chapter draws out a range of issues that have been identified by both the public and private sectors in relation to planning for tourism. The concerns are wide-ranging from policy issues to logistical matters. These issues were identified in the two surveys, the wider consultation and literature review.

9.2 The tourism industry is more diverse than commercial leisure in terms of type and scale of product. It has, therefore, been more difficult to get a consistent response to some of the key planning issues.

An overview from the public sector

9.3 Over 90% of LPAs reported that they are subject to pressure from at least one of the defined tourism uses.

9.4 The use for which there is most pressure is hotels; 44% of respondents reported pressure for this use. Pressure for touring caravan sites was mentioned by over 24% of authorities. No other use attracted a response rate of more than 20%, although for each use at least 10% of authorities stated that they were experiencing development pressure. Given that some uses would not be found in a proportion of the responding authorities (eg caravan sites are unlikely to be found in inner city areas), the results indicate that there is considerable development pressure for many tourist uses.

Main planning issues

9.5 For those facing development pressure for tourism uses, the main planning issue reported was the demand for development in sensitive areas such as Green Belts, National Parks, AONBs and SSSIs. The issues raised by the pressure for development in such areas were not always specified although some authorities expressed concern about the effects on the landscape or wildlife. Where LPAs did not specify their concerns, it seems safe to assume that those concerns were directly related to the special interests of the designated areas. Traffic and parking issues were raised in relation to several uses eg Bed & Breakfast, visitor centres and heritage sites.

9.6 Locational issues (town centre, out-of-centre, vitality and viability, PPG6/13) were mentioned by almost half of the authorities facing development pressure for hotels. The effect of uses on residential amenity was rarely cited as an issue in response to the question relating to development pressure. However, it was frequently mentioned as a problem in relation to smaller tourism developments. The lack of suitable sites was mentioned by almost 20% of authorities facing development pressure for hotels, but by only a handful of authorities in relation to other uses.

Table 9.1: Development pressure for tourism uses and related issues for LPAs - available from
Planning issues/problems with smaller developments

9.7 63% of authorities reported experiencing problems/issues with smaller developments. Three-quarters of rural authorities, two thirds of small towns and over 90% of London Boroughs stated that they were experiencing problems/issues relating to such developments. In contrast, problems/issues with smaller developments were mentioned by only half of the authorities in urban and metropolitan areas.

9.8 A range of problems/issues was reported. Over a quarter of all responding authorities stated that they encountered problems relating to traffic and transport, pressure on designated areas (Green Belt, SSSIs, AONBs) and impact on residential amenity. Other problems mentioned by at least 10% of respondents were; design and conservation issues, occupancy issues, signs, economic benefits and locational issues. Rarely did authorities list these other problems as the most important of the problems encountered.

Table 9.2: Main problems/issues with smaller tourism developments - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

Tourism as a distinctive land-use

9.9 Almost 20% of LPAs felt that tourism issues should be treated differently from other (leisure) land-uses in planning terms. Comments were made by these authorities about the differences between tourism and leisure uses and about the major differences between different types of tourism uses. Several of these LPAs (about 5% of all respondents) stressed that:

- some tourism uses have specific locational requirements often related to natural/heritage resources whereas others are less tied to locations;

- tourism uses often cater for a more dispersed market ie visitors from further afield generating longer journeys whose use of facilities can be seasonal. This results in differences between the environmental impact (trip generation) of tourism and leisure uses; and

- some tourism uses can produce wider economic and social benefits than other leisure uses, drawing in additional revenue from outside the area. One respondent noted that tourism uses were treated differently depending on the extent to which a local economy relied on tourism.

9.10 On the other hand, two county councils suggested that a clearer distinction needs to be made between recreation uses catering for local needs and tourism uses; the former should be protected and promoted to meet local needs whereas the latter should be treated in the same way as other uses in rural areas.

9.11 The responses to the questions about the development plan policies and planning
applications in Chapters 7 and 8 suggest that rather more than 5% of authorities treat tourism differently from other uses, giving significant weight to the economic benefits. This approach did not appear to be applied solely to those tourism uses tied to particular natural or historic resources but was applied also to footloose tourism uses by some authorities.

9.12 Issues will differ by location depending on the quality of the built and natural environment, the importance of tourism in the local economy and local transport infrastructure and highway conditions. Because of these differences, it was stressed that each case should be treated on its merits.

Tourism and the PPG

9.13 A number of LPAs commented that tourism uses raise significant sustainability issues and the differences between different types of tourism use referred to above led to different views on the applicability of the sequential approach to tourism. They considered it may be appropriate to treat footloose uses in the same way as leisure uses and apply the sequential approach. In contrast, they felt that it would be inappropriate to apply the sequential approach to uses that were related to natural/heritage resources and that, where appropriate, "rural policies should apply to such uses." This point is addressed in paragraph 24 of Draft Revised PPG13.

9.14 Rural authorities tended to support the view that tourism uses should be treated more flexibly because of the economic benefits they can bring to an area. In contrast, urban authorities emphasised that the sequential approach was appropriate for major attractions and facilities and that major facilities should be located in resorts and urban areas. One commented that there have been too many examples where large tourism facilities have been permitted elsewhere.

9.15 20% of authorities (mainly LPAs facing development pressure and which are recognised tourist destinations) stated that they would like to see additional advice relating to tourism uses in PPGs. Most respondents wanted to see additional advice or clarification of existing advice. A small number, however, wanted there to be changes made to the emphasis of PPGs. The nature of the additional advice sought is set out in more detail below.

9.16 The majority of those wanting additional advice wished to see more advice on the application of sustainability principles to tourism development. Clarification was sought on their application in rural areas and the appropriate balance to be struck between the environment and economic development. Several LPAs suggested that advice was needed in relation to the appropriate locations for large or small developments in the countryside, particularly in view of the lack of public transport in such areas.

9.17 Further advice on the application of the sequential approach was considered necessary by a substantial proportion of authorities:

- how should need/demand be assessed;
- how should the approach be applied to hotels/conference centres; and
- how should the approach be applied to open countryside, remote areas and the Green
Many felt the need for additional technical advice relating to the means of assessing cumulative impact or economic benefits of schemes.

9.18 Additional advice was considered necessary in relation to several other issues. Several authorities wanted advice on holiday homes and villages and, in particular in relation to occupancy conditions. One authority wishes to see additional advice on canals; another expressed a desire for more advice on retailing in holiday centres. One authority wanted advice on parking for hotels in town centres. One authority suggested the need for examples of good practice.

9.19 Most of the authorities seeking a change to the emphasis of the advice in PPGs wanted to see greater weight given to the economic benefits of tourism. In contrast the National Park authorities wished to see emphasis given to the need to pursue the purposes of National Parks. Other respondents wanted:

- greater recognition that local circumstances varied;
- acknowledgement that the sequential approach would not be appropriate for certain non-footloose attractions outside town centres (eg industrial heritage); and
- more emphasis on the need for a strategic approach to be taken to tourism development.

The Use Classes Order

9.20 Few authorities reported experiencing any problems with the application of the Town and Country Planning (Use Classes) Order. 11% reported that they had encountered problems with Class C1 and 5% reported problems with Class D2.

9.21 Although hostels are no longer within the same Use Class as hotels, a number of LPAs identified practical difficulties in this area:

- it is still difficult to distinguish between hotels, hostels and houses in multiple occupation (HMOs);
- different definitions used by different LA departments causes confusion; and
- monitoring clientele and effectively enforcing against breaches of control.

9.22 Several authorities stressed the need for effective control due to the very different impacts of the uses concerned; hotels being beneficial for the local economy, the other uses less so.

9.23 An additional problem mentioned by several LPAs, and relating both to rural and urban areas, was the inability to control the use of dwellings as holiday lets. The authorities
expressed concern that such changes reduce the stock of permanent dwellings available to local people, and wished to see planning control strengthened to address this issue. A further practical difficulty mentioned by one LPA was the difficulty of judging whether a change of use has occurred in relation to bed and breakfast and guest houses in private dwellings.

9.24 Only 8 authorities (5%) expressed concern about Class D2. Several commented merely that the class was too wide, although specific concerns were raised by two authorities about the inclusion of language schools (non-residential) and clinics and day centres within the Class.

**An overview from the private sector**

**Sites for development**

9.25 The private sector survey revealed availability of site/premises as the main constraint for hotels, with 83% of respondents saying it was very important followed by planning policy (58%) and the speed of obtaining planning permission (50%). Attraction operators faced a similar situation.

9.26 In the case of the self-catering market, responses were more varied. Planning policy and the speed of obtaining planning permission were still the top two constraints (with 58% and 42% of respondents respectively describing them as very important). The availability of new sites appears less important to the caravan sector as operators are generally more concerned about extending existing sites rather than new development. "*We dont need more sites, we need to be able to improve existing ones using small extensions to improve layout/landscaping.*" *(see endnote 43)* The availability of finance was an important factor for caravan operators, with a third of respondents saying it was very important.

9.27 Site issues were explored further in the context of PPG6. Operators were asked whether they thought their tourism developments could be located in or on the edge of town centres. The overall feeling was that it was rarely possible to locate in/near town centres, or only in certain circumstances. This was due to a number of factors; in the case of caravan parks, customers are specifically seeking a rural environment and town centre developments would be inappropriate. Hotels (and the few attraction operators) were more open to the idea with just over half saying it was generally feasible as opposed to one fifth of self-catering operators. However, hotel operators still mentioned limitations such as lack of suitable development land and relative land values leading to difficulties in economic viability. Other constraints with regard to using town centre sites for tourism developments were design and reduced appeal compared to out-of-town developments.

9.28 The extent to which there is a trade off between car parking and public transport provision (ie public transport provision replacing car park spaces) was also analysed. There was seen to be some trade off for town centre sites, but otherwise there was very limited trade off, especially for caravan/camping sites due to their predominantly rural location. 71% of respondents thought there was some or extensive trade off in town centre sites as compared to 32% for edge-of-town centre sites, 16% for out-of-centre sites and just 6% for countryside locations.
Planning Policy Guidance

9.29 Operators were asked if there were significant gaps in planning policy guidance (PPG21 in particular) covering tourism development, that could be overcome through provision of more detailed guidance. 53% thought that more detailed guidance would help, only 8% were not in favour but the remaining 39% did not know, perhaps reflecting a low awareness of PPG21.

9.30 In the qualitative comments, reference was made to:

- the limited obligation on LPAs to consider the wider merits of an application;
- the economic advantages of tourism development should be a priority;
- the generalised nature of Annex A;
- the concern that LPAs do not give the caravan industry due consideration and are not following the guidance in Annex B in relation to site improvements, mixed touring units and length of season; the guidance should be strengthened in these respects;
- the need to revise guidance to allow on-site accommodation for site managers and the re-location of caravan sites affected by erosion or flooding;
- the need for more guidance on tourism development on inland waterways and at coastal recreation areas eg beaches, heritage coastlines;
- the need for more guidance on holiday villages; and
- the need for more advice on sustainable development.

9.31 61% of respondents thought planning policy guidance showed some inconsistencies. There was variance in response between hotels and other respondents, with 75% of self-catering operators and attraction operators/agencies saying there were inconsistencies as compared to 40% of hotels. Comments by operators provided further insights into these problems experienced with planning policy guidance. These may be summarised as:

- there is a perception that guidance is interpreted differently in different parts of the country and by different inspectors;
- there are growing concerns about perceived conflict between the generally supportive tenor of PPG21 and the more restrictive policies in PPG7 and PPG13. Both cases were put. "These guidance notes do not allow for the fact that much tourism development can only be sited in the countryside and access to rural areas is predicated on private transport. This has led to cherry-picking of policies to meet individual objectives." Or, "We would emphasise the need for PPG21 to be in line with the latest policy guidance on sustainability, reducing the need to travel by car, social inclusion and environmental quality as in PPG7"; (see endnote 44)
- there is concern that there should also be closer integration between other, related PPGs eg 9 (Nature Conservation), 17 (Sport and Recreation), 20 (Coastal Planning) and PPG21.
However, few specific references to conflicts between PPGs were quoted in the responses; and

- one operator referred to the need to clarify how tourism developments, infrastructure and accessibility by alternative means will be included in Regional Planning Guidance and in the work of the Regional Development Agencies.

9.32 54% of respondents thought that it would be helpful if there was a new PPG21 dealing with all aspects of tourism planning. Only 14% were against the idea, but a third said they did not know, indicating a high level of uncertainty.

9.33 Two thirds of respondents were in support of the sequential test (as represented in PPG6) although 42% thought it needed modification or clarification. Response rates were low as many organisations felt this question was not appropriate to their circumstances, notably caravan sites. Qualitative responses highlight some of the problems with the sequential test:

- the sequential test must take into consideration the wider development (economic) issues ie that a certain scale of development is often necessary to make a scheme viable;
- out-of-town and out-of-centre sites fulfil particular needs; the sequential test can be inappropriate for caravan sites and hotels; and
- it is also clearly inappropriate for a number of recreational activities eg boating.

9.34 Approximately two thirds of respondents felt that tourism land-uses should be distinguished from other forms of development (about half of the hotel respondents). A number of specific attributes were referred to:

- many tourist facilities (caravan sites, holiday villages) are dependent on a rural location and help support the rural economy;
- the economic benefits of some developments;
- the need to regularly upgrade attractions; and
- the special design issues of caravan sites.

9.35 Respondents were asked what additional national planning guidance they would like to see for tourism development. The answers were varied including:

- an obligation on LPAs to designate sites for hotel use in development plans;
- reinforcement of the economic and social value of tourism to the local economy and greater encouragement for the industry;
- tourism uses should be interpreted as employment uses for planning purposes;
greater flexibility, and priority for extending existing facilities (including hotels in the Green Belt);

- stronger support for public transport provision; and

- policy to reflect the need for tourism development in rural areas.

9.36 Respondents made the following suggestions for planning guidance for tourism development at a regional level:

- RPG must make tourism a mandatory issue for consideration, not just as an other land-use and could combine tourism and recreation;

- RPG must be consistent with national and local policies but with a regional focus;

- RPG should help redress the current bias against caravans;

- parking requirements need to be standardised policy, not different between LPAs. RPG could help clarify the issue; and

- RPG could be used to identify key areas of tourist use eg estuaries, sea and inland waterways (and related development) which cross LPA boundaries.

9.37 One respondent was keen to avoid regional economic benefits of tourism overriding environmental issues. "There should always be environmental assessment of major developments and strategic environmental assessment of regional development plans."

**Development plan policy**

9.38 Respondents were asked about their experience with local authorities. Overall, they did not rate local authorities highly on their knowledge of tourism, with 52% of respondents describing their knowledge as bad/very bad and just 15% rating them good/very good. (In a CBI survey of businesses, lack of understanding of the industry was considered to be the main barrier to development. [see endnote 45])

9.39 With regard to the effectiveness of development plans in facilitating tourism developments, overall 55% of respondents thought they were bad/very bad (40% of hotel operators and 63% of self-catering accommodation providers).

9.40 Tourism and visitor management strategies were described as poor/very poor by 53% of respondents, good/very good by 23% of respondents, with the remaining 24% giving an average rating.

9.41 For those respondents who thought that development plans make poor provision for the needs of the tourism industry, 84% attributed this to a lack of relevant policies, 76% to wrong policies and 65% felt it was due to a lack of identified sites. Specific comments included:
• planning officers need to work more closely with tourism officers, the industry and members so that the full worth of tourism is recognised;

• generalised policies are better for sensitive environments allowing flexibility to judge the quality of a development;

• LPAs need to understand the difference between commercially viable sites and LPA preferred locations. It may be necessary to give some incentive to go to a commercially marginal site;

• tourism uses can rarely compete with sites allocated for a variety of other commercial uses; and

• given that there are few tourism site allocations, tourism development is often contrary to development plans.

9.42 Operators were asked how closely LPAs work with the tourism industry in drawing up development plans. Responses were fairly consistent across all categories. Fifty per cent considered that, as a general rule, LPAs rarely work closely with the tourism industry in drawing up development plans, 47% considered that they sometimes worked closely with the tourism industry and just one respondent (3%) felt that this is usually the case.

9.43 Respondents were asked to what extent they monitor development plan preparations, make representations or engage in the development plan process. Responses varied between hotel and caravan operators. 25% of hotels consistently monitor development plan preparations, make representations or engage in the development plan process compared to 47% for self-catering accommodation providers. Indeed 58% of hotel operators very rarely engaged in the planning/development process. It was commonly stated that the cost of monitoring/participation and lack of reaction from LPAs meant that developers have given up making representations. Operators that did engage in these activities do so:

• to raise the profile and ensure a fair hearing for the industry, or particular sectors eg by tourism related trade associations or clubs;

• to register their views in order protect a long-term position, particularly if they are likely to go to appeal, or they are targeting certain sites or areas; and

• to protect their own resources from inappropriate development.

9.44 Respondents were asked whether they supported LPAs being more pro-active within their development plans. In general, there was support across the whole range of activities. The greatest support was for:

• local authorities providing a strategy for location (68%);

• undertaking market/ capacity analyses (65%);
• providing planning/development briefs for sites (63%);
• allocating sites for tourism development (57%); and
• assisting with site assembly (44%).

9.45 However, there were concerns about a pro-active stance:

• that development plans have too long a time-horizon for tourism trends;
• that LPAs are not in a position to identify market capacity or commercial sites; their role should be to enable development opportunities identified by the private sector and to help sustain existing facilities;
• that there is a commercial advantage in spotting a site first, an advantage that would be lost if there was no flexibility; and
• that LPAs will not enter a dialogue with the industry at an early stage and work in partnership with the industry.

**Development control**

9.46 86% of respondents usually/sometimes discuss their development proposals with the local authority prior to submitting a formal planning application, 94% usually/sometimes prepare a case of need to support a planning application and 86% usually/sometimes undertake impact studies to accompany planning applications.

9.47 With regard to market studies, 94% thought that they are sometimes/usually useful, with only 2 respondents (6%) believing they are never useful.

9.48 Results show that three quarters of respondents consider local authorities to be sometimes or rarely consistent in their decision making at present. This position has not changed in recent years. Comments included:

• political bias overcoming more objective officers recommendations; and
• variations in interpretation between different local authority areas.

9.49 Operators had encountered problems with a number of different planning/development issues as shown in Table 9.3.

**Table 9.3:** Problems encountered with planning policies or their application - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

9.50 Over a third of respondents often had problems with the top five problem areas listed in
the table above. The overall lack of understanding of tourism is consistently referred to along with the overly-protective attitude in designated and countryside areas. Operators are concerned that policies are used as constraints rather than as enablers.

9.51 Operators were asked whether they thought a change in the Use Classes Order would be helpful. The majority of respondents (67%) did not know, with only 7% supporting it and 27% saying it would not be useful.

Summary of key issues

9.52 The survey of private and public sector perspectives focused, as in the leisure study, on both policy and process issues. Here the spotlight is on PPG21, and whether revision is needed to embody sustainable development principles and to bring it into line with PPGs 6 and 13 in particular for instance on issues such as minimising trip generation.

9.53 The balance to be struck between economic development and environmental considerations in tourism planning policy was identified as a general issue; but responses touched on whether there are special circumstances related to tourism in rural areas that should be taken into consideration.

9.54 In the hotels sector, key issues are whether the location of hotels should be considered in the context of PPG6 and the sequential test, and about how far the planning system can help resolve the problems of site availability for hotels. In the caravans sector, there is an issue as to whether the principles in PPG21 of encouraging site improvement through managed expansion are realistic and effective. In this sector and in respect of accommodation more generally, a key issue is whether planning guidance should be strengthened to meet the problems of seasonal and holiday occupancy conditions. There were also perceived problems with the Use Classes Order for tourism land uses, raising the issue of how planning guidance might assist.

9.55 Turning to process issues, the research highlights the potential roles of visitor management/tourism strategies, Regional Planning Guidance and capacity analyses in planning for tourism development. It highlighted issues about what role the private sector should play in the formulation of tourism planning policy and development plans, whether there is a place for formal partnerships, and whether planners should be more pro-active in identifying need and sites and working more closely with the industry.

Endnotes
43. Quote from private sector survey
44. Quotes from private sector survey
45. CBI, 1996, op cit
10. The Tourism Case Studies

Introduction

10.1 As part of this research, five tourism case studies have been undertaken. This involved finding suitable destinations where the issues identified could be investigated in more detail on the ground.

Issues to explore

10.2 Given the focus on planning procedures and processes in the Stage 1 case studies, the emphasis in Stage 2 was placed on exploring issues particular to the special nature of tourism. The issues drawn out in the preceding chapters were presented to, and approved by, the steering group under a number of headings:

- the relevance of planning policy at regional level, the role of RPG and the relationship between regional planning guidance and regional tourism strategies;
- the co-ordination and integration of development plans, tourism strategies, visitor management plans and other policies at a local level;
- planning for caravans; PPG21 (Annex B) is noted for its positive attitude towards a land-use that has not always been sympathetically treated by LPAs. Although PPG21 introduced guidance on a number of key issues, it is suggested that many LPAs are still resisting the opportunity to be more flexible on these points. There is also pressure from within the industry to:
  - allow for wardens residential accommodation on holiday caravan parks; and
  - provide for re-location where sites are affected by coastal erosion or flooding.
- the planning implications of out-of-town (budget) hotels. The inter-relationship of PPG21 and PPG6 and the special nature of tourism facilities;
- the development of non-footloose attractions in the countryside. How should planning deal with development such as historic or natural sites that can not be subjected to locational control?
- the impact of a major tourism development eg holiday village or theme park. Is it practical and appropriate for the development plan process to attempt to plan for large-scale, ad hoc, tourist developments such as theme parks or major holiday villages?
- the impact of (publicly funded) attractions. Tourism facilities are often used as the catalyst for urban (and rural) regeneration initiatives but regeneration sites are often out-of-centre and may be considered to be in conflict with PPG6 principles. Has their planning been on the basis of sustainable principles or more pragmatic concerns?
- the impact of cumulative, small-scale rural tourism development. The implementation of sustainable tourism strategies means avoiding the worst environmental impacts, including
those associated with additional car journeys. In designated areas, these planning issues are highlighted. In theory, placing constraints on trip generation could have a significant impact on the nature and scale of tourism in rural areas (and farm diversification), particularly where public transport is non-existent;

- the efficacy of seasonal occupancy planning conditions (PPG21 Annex C). Seasonal and holiday occupancy conditions are a cause for concern, both for units which are subject to market pressures to become full-time residential and the potential loss of permanent residential accommodation to tourism; and
- the efficacy of protectionist and regeneration planning policies in resorts. Do our coastal resorts need special consideration in planning terms?

Choosing the case studies

10.3 A number of criteria were used to prepare a list of suitable case studies ie cases were sought that offered or allowed:

- the opportunity to consider more than one issue;
- a geographical spread; and
- the assistance of LPAs and developers/operators.

10.4 Given that only five case studies were possible, the final selection that offered the best balance and coverage was deemed to be:

- the North West Planning Region to cover regional tourism planning and strategies (involving resort and rural tourism development issues);
- Cambridge, to explore a new approach to tourism planning and visitor management;
- Cornwall, to review the nature and impact of budget hotels;
- Great Yarmouth, to consider a positive approach to planning for caravans; and
- Fountains Abbey, to consider the development of a non-footloose attraction.

10.5 The case studies were presented to DETR as working papers; summaries are presented here.

Case Study Summary:

Regional Planning For Tourism In The North West
Location and background

10.6 The North West planning region (and Development Agency) encompasses the Regional Tourist Board (RTB) areas of Cumbria and the North West.

10.7 The current Regional Planning Guidance (RPG) for the North West (RPG13) (see endnote 46) is out-of-date and new RPG is in the early stages of preparation. At the time of preparing the case study, an issues report had just been published (see endnote 47) within the context of draft PPG11 (see endnote 48). (In the North West, as in some other regions, the RDA strategy will be published well in advance of RPG whereas it should set the economic development context for, and reflect, RPG.)

10.8 Both RTBs have prepared regional tourism strategies (see endnote 49), (see endnote 50) and were subsequently asked to prepare, in conjunction with the North West Regional Assembly Tourism Task Group, a report to help the development of the North West Regional Strategy. Within these three tourism strategy documents, various issues pertinent to regional planning are raised:

- it is argued that over-restrictive planning policy in an environmentally sensitive area such as the Lake District National Park is based on inaccurate assumptions about the growth and impact of tourism without adequate, accurate data or analysis. This is restricting economic opportunities for isolated areas which need to re-structure and can accommodate growth;

- the importance of integrated transport plans to regional tourism planning where improved public transport is needed to help ease congestion in sensitive areas along with pressure for improved road infrastructure to encourage development in re-structuring areas; and

- how best to support and reverse the declining fortunes of the (sub-regional) resort belt of the Fylde coast as a tourism resource for the region (see endnote 51).

10.9 The relevant issues to be explored in this case are:

- what contribution has planning made to tourism development at regional level?
- does the framework of (draft) PPG11 offer any new potential? and
- what contribution could RPG make to regional tourism issues?

Key findings

Tourism planning and the old RPG

10.10 PPG21 states that "An important function of regional guidance is to encourage alternative areas for tourism development, where needed, as a way of easing pressures..."
on locations likely to come under unreasonable pressure. “(para 4.5) The Guidance refers specifically to different destination types; designated areas (where development is likely to be more restricted), historic towns (where building conservation is critical), seaside resorts (where improvement is a priority) and the countryside (where sensitivity is required).

10.11 PPG21 also suggests that general locations for most major developments might be identified in structure plans but, notwithstanding, plans should give a clear indication of the criteria that local plans should apply in assessing the suitability of particular sites.

10.12 Tourism issues in RPG13 (North West), however, are summarised in just two paragraphs, which is scant coverage given the acknowledged importance of tourism to the region. The guidance is also very general in nature. For example:

- references to sub-regional areas merely reiterate current local planning policy; there is no overview of the relevant issues and implications; it just reiterates, for example, "a continuing need, except where environmental considerations dictate otherwise to direct appropriate new tourism investment to existing areas."
- the section on rural regeneration makes no reference to tourism; and
- it suggests site identification and relevant criteria for major projects should be included in development plans.

10.13 In consultation, the perception of LPAs and others in the tourism sector is that RPG13 (and RPG notes nationally) have, to date, fallen far short in terms of addressing tourism issues of regional planning concern.

Tourism planning and the new RPG

10.14 Draft PPG11 offers the opportunity for new RPG to review this situation given its objectives of resolving planning issues at the regional or sub-regional level with:

- more prescriptive, comprehensive spatial strategies "which extend beyond land-use issues", and which could contain sub-regional strategies;
- complementary approaches with RDA and other regional strategies;
- the incorporation of transport strategies; and
- clearer relationships to EU initiatives and Single Programming Documents.

10.15 Unfortunately, tourism as a policy area is merely referred to in the draft under Other topics. However, it is suggested that tourism is a topic that is likely to genuinely need to be addressed at the regional or sub-regional level. It then just refers to RPBs working with RTBs to consider whether there are potential new regional facilities for which location criteria need to be specified.
The recent issues report for revised RPG13 acknowledges that tourism has "a unique potential to change not only the face of the economy and the community, but to have a powerful effect on the image of the region as a whole." It poses the question, "How can the regions planning process help to promote and develop sustainable tourism and cultural industries?"

**The potential of new RPG in the North West**

10.17 In the context of the North West, many consultees felt that the new RPG might add real value by undertaking an external, independent review of tourism sub-regions. A consistent, comparative study, across the region, could assess current tourism impacts, future environmental capacity and economic need for further tourism development (including appropriate farm diversification or resort development) in a land-use planning context. This would reflect an old recommendation of the Cumbria Structure Plan EIP panel to undertake capacity studies. These capacity studies would define relevant levels or criteria for control or support for different sub-regions taking into account the availability of alternative locations (as referred to in PPG21) and local economic priorities ie a regional classification based on specific circumstances rather than generalised designations. (This is based on the assumption that not all National Parks or AONBs require the same levels of restraint, not all parts of the same designation need the same degree of control and not all resorts require the same level or type of support.) Local authorities would then be able to apply their own means of control within that broad context eg the scale of new accommodation development etc.

10.18 Strategic tourism development objectives such as the promotion of West Cumbria, Furness and the Fylde resorts are dependent on good access from outside the region. (They also imply additional local trip generation with visitors using accommodation outside the National Park and commuting in.) All parties would like to see improved regional public transport but, in rural Cumbria, tourism development is seen to be dependent in large part on enhanced road access. Such decisions need to be taken on a regional level and the consequences of any decision made clear and explicit eg the scale of environmental impact on the routes through the National Park or the impact upon tourism aspirations in West and South Cumbria.

10.19 Signposting is another significant, related transport issue in the region which local consultees felt should be addressed at the regional level.

10.20 This definition of tourism areas is important in other respects. Tourism, at present, has a low profile in terms of RPG. Most consultees felt it essential that the relative volume and value and needs of tourism are recognised at regional and sub-regional level. The Lancashire resorts, for example, dominate regional tourism and have significant needs yet this is not reflected in the RPG. Clear definition of resorts or resort areas as sub-regional development areas would help raise awareness of the contribution and needs of the area eg socio-economic problems, over-supply of poor quality visitor accommodation, bathing water quality, coastal defences.

10.21 Appropriate spatial planning definitions could highlight and reflect tourism development priorities; they could also be used to provide a clearer framework for EU (and other funding) initiatives. It may also be possible to develop thematic funding bids, tied to the particular problems confronted by different tourism areas eg resorts and/or the harbour towns of
10.22 The key regional tourism planning issue identified in PPG21 and draft PPG11 is the need to consider whether there are potential new regional or sub-regional tourist facilities for which location criteria need to be specified. This issue probably stems from concern in the recent past about how to deal with major developments such as the new breed of large holiday villages eg the Oasis Holiday Village in Cumbria or new theme park proposals. There have been few such applications and set criteria have proved unnecessary.

Further issues emerging from the case study

10.23 The tourism issues referred to in draft PPG11 do not appear to be the highest priorities for the industry or planners eg location criteria for new regional facilities. In the North West, RPG could make a clear, constructive contribution to regional tourism land-use planning. To a large extent, this will depend upon the resources available at regional level to consult, identify relevant issues, undertake appropriate research, analysis and monitoring to resolve those issues. Could RPG give more weight to tourism issues? How should the regional tourism planning priorities be identified and by whom?

10.24 In particular, there may be great potential for RPG to set the context for sub-regional capacity studies and identify areas of development opportunity. This would require comprehensive, new research in some cases to establish accurate base-line data. Are (sub)regional capacity studies more than is currently anticipated for regional planning guidance?

10.25 In parts of the North West Region, there are competing demands to restrain tourism traffic in sensitive areas and develop communications to new tourism areas. Such strategic decisions need to be taken at regional level. In tourism terms, it might be argued that there should be an inter-regional component given that travel decisions are often made in other parts of the country. Will the integrated transport plans within RPG meet the need to control tourism trips?

10.26 The definition of planning criteria for major tourist facilities has not arisen as an issue of regional significance.

Case Study Summary: Tourism And Local Planning In Cambridge

Location and background

10.27 Cambridge (population 106,000) is a historic city with a unique and highly valued built heritage, a renowned centre of education and a focus for economic growth. Tourism is a significant element in the economy bringing both benefits and problems.

10.28 Cambridge attracts in excess of 3 million visitors, making it one of Britain’s most popular tourist destinations. Most visitors come for a day visit only, and do not stay long - the average length of visit is five hours. Many visitors arrive in groups, and the numbers involved can be substantial. Those visitors who do spend the night in the city stay for a short time - one or two nights are the norm. Two-thirds of visitors to Cambridge arrive by private transport car (56%)
and tour coach (10%). Rather less than one third arrive by public transport - train or service bus.

10.29 The historic Colleges and their open spaces and gardens are overwhelmingly the most popular attraction for visitors, with the River and Backs, churches and other historic buildings also important. All these attractions are concentrated in the comparatively small area of the historic centre. Although they constitute the major attraction to tourists, they are not designed or intended as tourist attractions and this contradiction lies at the heart of some of the problems of management in the destination.

10.30 The principal tourism concerns for planning and visitor management policy in Cambridge are:

- large and growing numbers of visitors, concentrated in the historic core of the city;
- pressures to provide more accommodation for staying visitors, including conversion of residential accommodation;
- pressures to provide for other facilities or attractions including expansion of Language Schools; and
- traffic management problems. Tourism contributes to, but is not the major cause of, increasing car congestion in the city. However, coach parking and management are specific tourism issues.

10.31 The issues to be examined in this case study relate to the procedures used to ameliorate these problems including:

- co-ordination and integration of development plans, tourism strategies, visitor management plans and other policies between the City, county, adjacent districts and other agencies; and
- partnerships between public, private and the not-for-profit (NFP) sectors.

Key findings

Consistency of policy and plans

10.32 There are a number of significant public and private stakeholders in tourism policy and management within the city.

10.33 Cambridge City Council has several Council departments involved in tourism; Leisure, Personnel and Professional Services, as well as Planning. The Cambridge Local Plan (adopted November 1996) deals with tourism in a specific chapter and within other topic areas.

10.34 Tourism policy is formulated in the context of PPG21, RPG6, the Structure Plan and the
Citys adopted tourism strategy (see below). The adopted Local Plan contains few specific references to PPG6 and 13, since much of the policy was formulated prior to their publication, but it is in line with their concerns, and includes policies to:

- support the town centre;
- oppose proposals that affect its vitality and viability;
- minimise the need to use transport (especially cars); and
- provide accessibility to jobs and services, particularly to those without a car.

10.35 The plan seeks dispersal of visitors within Cambridge and to the surrounding area. It emphasises that this will require "the Council working with public and private agencies" and points out that effective management of tourists requires "planning, co-operation and agreement between the interested parties and should be seen in the context of town centre management". There are five sets of land-use policies:

- the plan allocates sites for the development of serviced accommodation to encourage more overnight stays and defines the type and location of accommodation that may be converted to guest houses;
- applications for new attractions that complement the existing cultural character of Cambridge will be considered sympathetically but permission will not normally be given for attractions that draw in additional visitors;
- "The careful and environmentally acceptable expansion of small to medium sized specialist conference business may be supported";
- "Language School students contribute disproportionately to the problem of disturbance" and development of new or extension of existing Language Schools will not be permitted; and
- the overall strategy is to limit car use and increase the role of public transport, walking and cycling and this philosophy applies to tourist trips. In addition, tourist coaches can add to traffic problems and be intrusive in the historic centre. Improved facilities and parking for coaches at park and ride sites will be sought.

10.36 The Cambridge Tourism Strategy (1996) covers non land-use policies, including marketing, provision of services, information and visitor management. It stresses that tourism should be managed, not promoted, and draws attention to the importance of marketing and appropriate development and the need to improve visitor services. The strategy emphasises the importance of collaboration and building consensus in a fragmented industry where policy success requires co-operation from a variety of different agencies. The Strategys purpose is to:

- set down strategic issues, a framework for action;
• guide and direct future investment and services;
• provide a framework for partnerships;
• guide the Council's response to external pressures and policies;
• identify indicators against which performance can be judged; and
• promote a better understanding of tourism in Cambridge.

10.37 The Strategy seeks to "reconcile the sometimes competing needs of residents, visitors and the environment" by:

• controlling the growth in total numbers of visitors to Cambridge;
• managing tourism to minimise environmental pressures and congestion; and
• spread the benefits of tourism geographically and socially.

10.38 The Strategy includes policies on topics that are inappropriate for a development plan for example, marketing. However, it supports the main tourism concerns of the Local Plan.

10.39 The Strategy argues that "the key to successful implementation is partnership. The aim of partnership is to eliminate conflict, co-ordinate action and seek cost-effective spending". Policies involve:

• encouraging local understanding of the tourism industry;
• co-ordinating the Tourism Strategy with City Centre Management;
• working with other authorities and interested parties on matters affecting the proper management and development of tourism in Cambridge;
• continuing bilateral co-operation between the City Council and other interests, especially the colleges and representatives of industry sectors; and
• preparing an annual monitoring statement.

10.40 Other Council documents linked to tourism development are:

• the Cambridge Leisure Strategy (1998);
• the Economic Policy Statement (1998);
• the City's Local Agenda 21 strategy (1998); and
• the City Centre Management Plan (1998).
10.41 Cambridgeshire County Councils Structure Plan reflects RPG6 and seeks "dispersal of investment in jobs to the north and east of the region". Tourism policies echo and develop this, and seek to disperse tourists away from Cambridge. Transport policies emphasise environmentally acceptable means of transport and the use of public transport, cycling and walking.

10.42 More specifically, it states "Emphasis will be given to the selective development and positive management of tourism in the Cambridge area to:

- maintain the role of the city as a prime tourist attraction on an environmentally sustainable basis;
- encourage longer stay tourism;
- restrain the growth of forms of tourism which rely on motor vehicles being brought into the central area;
- encourage a wider spread of tourist activity within the Cambridge area; and
- develop linked attractions in the county in co-ordination with relevant authorities and organisations."

10.43 The plan acknowledges the importance of other types of policy and other actors in achieving these goals. It argues that there must be a visitor management plan; a strategy to encourage off-peak visitors, increase spending, and encourage longer stays etc and that "effective implementation will require close co-operation between the local authorities, the East Anglian Regional Tourist Board, the English Tourist Board and all parts of the private sector involved in the tourism industry".

10.44 The East of England Tourist Board (EETB) acknowledges that heritage towns "suffer from congestion due to expanding economic activity, but the problem is exacerbated by tourists. In Cambridge visitor pressure is of particular concern to the Colleges" (see endnote 52). The EETB policy response is "to assist local authorities to prepare tourism management schemes to mitigate visitor pressure where appropriate". This acknowledges the importance of selective restraint in areas of tourism pressure (and dispersal of visitors across the region, away from pressurised destinations such as Cambridge and, hopefully towards the seaside resorts.)

10.45 The Colleges own the main attraction for visitors and can control or exclude access by visitors. (The University is important for international awareness of Cambridge and for business tourism.) Individual Colleges develop their own policies towards visitors.

10.46 Other NFP organisations such as museums, galleries and churches. Many depend on paying visitors for operating revenue, and in practice may be seen as part of the commercial sector.
The tourism industry includes a diverse range of firms and individuals. Some are wholly reliant on tourism eg hotels and language schools, others see tourists as just one part of their market eg most retailers and restaurants.

Local residents and non-tourism industries are affected by tourism, but - apart from residents working in tourism - do not participate directly in the industry.

With this multiplicity of interests, effective co-ordination and partnership is required to achieve policy consistency.

Co-ordination and partnership

Within the City Council, the Environment Committee is responsible for both tourism planning and policy and for tourism management. Its other responsibilities include; planning, transport, economic development, environment and conservation, city centre management, licensing and Local Agenda 21. The Committee is thus in a position to take a holistic view of the many elements of tourism policy and management.

A Chief Officers Board meets regularly to review and co-ordinate policy and activities. There is no specific mechanism to co-ordinate tourism policy and initiatives. However, officers speak of the strength of a corporate culture and commitment to corporate working that means that meetings and discussions take place frequently to ensure co-ordination.

The Cambridgeshire Tourism Officers Group (CTOG) was established in the late 1980s, and comprises the tourism officers from the County, all Districts in Cambridgeshire and EETB. Its main concern is with marketing initiatives, particularly in promoting the northern and eastern parts of the county, in line with Structure Plan policy. It involves representatives of other tourism interests as necessary. The Group does not have a specific role in co-ordinating planning policies for tourism.

Formal co-ordinating mechanisms such as CTOG are important, but there is continuing liaison on an informal basis too. An illustration of this co-operation is that currently South Cambridgeshire DC are funding a tourism officer who is based in Cambridge Citys TIC. She devotes some of her time to TIC business and the rest to developing a joint strategy with tourism businesses in South Cambridgeshire. This post is a practical acknowledgement of the close inter-relationship between LAs in managing tourism.

Planning policy for tourism is discussed between County and Districts, and between Districts, as necessary during the processes of policy review and plan preparation. The EETB also comments on the tourism elements of development plans when they are under review. Chief Planning Officers from the County, the City and all DCs meet every 6 weeks to discuss current issues. Other joint Officer or Members groups deal with policy that affects tourism for example, transport.

The Cambridge Tourism Group (CTG) is made up of 11 representatives of the main tourism interests in the city, including hoteliers, transport, language schools, Colleges/University, attractions, Chamber of Commerce and the City Council.

The Group is formally a Working Group of the Environment Committee to which it
reports annually. It meets every 6 weeks. The CTG is intended to be action orientated and has sought to focus on specific projects where there is scope for mutually beneficial co-operation between different tourism interests eg developing short-break packages. However:

- members have very divergent interests, so often there can be no coherent tourism view, even from the commercial sector;
- not all issues that are discussed or pursued by the Group are relevant to all members, and this can reduce commitment; and
- the Group has no budget.

10.57 The Cambridge Tourism Forum meets annually and is open to all tourism interests in the city. The Fifth Annual Forum was held in October 1999 and attended by 68 delegates. The Forum is intended to review and monitor the Tourism Strategy, and discuss other matters of local tourism importance. Feedback from delegates shows positive support for the CTF.

10.58 Again, consultees were supportive of the Forum. Those from the commercial sector particularly saw it as an opportunity to make the case for tourism and its importance to the city in a public forum, and to influence Councillors as well as a wider public. The benefits of improved understanding of different points of view, and of networking, were again cited.

10.59 City Centre Management consists of the:

- Executive Group: 8 members, representing major stakeholders in the city centre (residents, local authorities, property owners, retailers, the University and Colleges);
- Consultative Forum: some 30 members representing a broader range of groups and organisations, including transport operators and hotellers; and
- City Centre Management Team: 4 people responsible for managing the initiative (City Centre Manager and Assistant City Centre Manager), and for dealing with day to day problems (two City Centre Rangers).

10.60 The College Bursars Committee has a Tourism Sub-Group with representatives from those Colleges most concerned about visitation mainly those along The Backs. The Sub-Group discusses matters of common interest. The Colleges are represented on the CTG and the City Centre Executive and Forum. The Colleges see the CTG as useful, and have participated in a number of its projects. They argue that the potential conflicts between them and the commercial tourism industry have lessened and that the mechanisms for policy co-ordination in the city work well.

10.61 There is clearly overlap between CCM and Visitor Management, and thus between the groups represented on the CTG, the CTF and the CCM Executive and Forum. Potentially, this could mean that contradictory views are expressed in different groups, but this has not happened.
10.62 Policy success is self-reinforcing. The general thrust of Council policy on tourism seems to be widely accepted and is seen to have been effective. The Colleges approach to managing visitor numbers also seems to be well regarded. This has encouraged participation in further policy development and in new initiatives.

10.63 There appears to be general satisfaction with the partnership and co-ordination mechanisms, which are seen by both public and private sectors as positive and helpful. The various Groups have been effective in:

- bringing together different stakeholders;
- giving them an input to policy;
- increasing trust, understanding and networks; and
- providing a basis from which to develop solutions to shared problems.

Such co-operation has been vital and constructive in seeking a resolution to the coach drop-off problems in the city, for example.

10.64 There has been a focus on finding common ground. Initiatives such as the CTG and the Tourism Forum are opportunities for different interests to contribute to policy formulation and to make their concerns known. There are benefits simply from ensuring the different stakeholders can meet and understand one another's point of view better.

10.65 The City has been concerned to focus discussions around positive agendas wherever possible, by finding projects that can be mutually beneficial. For example, the Cambridge Tourism Groups first project was to develop a programme to encourage more short-break visitors. Since these visitors have more beneficial economic impacts on businesses and fewer adverse impacts on residents (short-break visitors are less likely to add to peak time traffic congestion, for example), there was the opportunity for all to agree. This approach emphasises building trust between the different stakeholders, which means that it should be easier to secure acceptance of policy in areas where there are more conflicts.

Further issues emerging from the case study

10.66 All the policies and plans emphasise the need for co-ordination of policy and co-operation between interested parties in order to achieve success in terms of tourism planning and visitor management. The response to the tourism problems in Cambridge has been proactive and constructive across all sectors but this may not always be the case. What are the criteria for effective management of tourism planning?

10.67 These consultative and co-ordinating mechanisms are in addition to the normal consultation as part of the process of review of development plans and consultation over planning applications. They can be complex and require significant commitments (and resources) from a wide range of interests, many of whom are not directly related to land-use planning. Is visitor management the responsibility of town planners? Are there specific benefits
to the planning process from such an approach?

Case Study Summary: Budget Hotels In Cornwall

Location and background

10.68 Over the last two decades there has been considerable growth in the number of new hotels being developed in the UK fuelled, in large part, by the growth in budget hotels.

10.69 Budget hotels are normally sited adjacent to, and serviced by, a restaurant/bar and situated in positions with good access to the primary road network and commercial areas. Virtually all budget hotel development, until very recently, has been out-of-centre, to achieve low land costs and easy access by car.

10.70 It was not until August 1996 that Cornwall gained its first branded budget hotel ie owned by a major recognised hotel group. The Penhale Travel Inn on the A30 was a rapid success and Whitbread developed their second at Carnon Downs near Truro a year later. There are now a number of other proposals in the pipeline for the County.

10.71 Carnon Downs is a small village approximately 4.5km south of Truro, county town and main commercial centre. Truro is central to the dispersed smaller commercial centres in the county; Bodmin, St Austell, Newquay, Falmouth, Camborne and Redruth. It is also the main town servicing an extensive holiday area, mainly on the south coast but also accessible from the north coast.

10.72 The hotel site, adjoining the village, has access directly from the A39 Truro to Falmouth Road. The complex, opened in November 1997 at a cost of around £2.25m, comprises:

- 40 bedroom Travel Inn hotel including 20 double rooms, 18 family rooms and 2 rooms for those with disabilities;
- the Old Forge (Brewers Fayre) pub/restaurant with 206 covers and managers accommodation;
- indoor play facility, the Fun Factory including ladders, slides, ball pond and soft play area for the under fives plus external playground;
- 124 car parking spaces plus 8 bicycle stands and one coach bay; and
- extensive landscaping with footpath link to village.

10.73 The site was previously in agricultural use and although outside the village envelope, it was granted planning consent in 1991 for a larger (100 room) hotel. The LPA was against the proposal but it was felt that it would not be possible to defend a refusal given the very positive policies in the structure plan in favour of new hotel development. There was, however, considerable concern about intrusion into the landscape.

10.74 No development occurred until Whitbread applied in 1996 for the existing development.
Again, there was concern about visual intrusion along with landscaping, massing of the building, materials etc. A compromise appears to have been reached on the ridge line and Whitbread agreed to use natural Cornish slate, roughcast rendering and natural stone cills. Consent was granted subject to conditions.

10.75 Penhale, the second site, is located approximately 13km east of Newquay and 20km west of Bodmin. It is located on the A30 trunk road (the main spinal route through Cornwall) near its junction with the A39, another major route in Cornwall. Its catchment area overlaps that of Carnon Downs but it has a significant transit trade from those travelling further west and serving business and tourism visitors in the Newquay and St Austell areas.

10.76 The complex, opened in August 1996 at a cost of around £2.25m, comprises:

- 40 bedroom Travel Inn hotel including 20 double rooms, 18 family rooms and 2 rooms for those with disabilities;
- the Penhale Round (Brewers Fayre) pub/restaurant with 200 covers and managers accommodation;
- external playground; and
- 140 car parking spaces.

10.77 The site is part of a larger business park and residential proposal granted planning permission in 1993. The outline consent included petrol station and restaurant, hotel, craft workshops and information centre. Officers recommended refusal for the whole development (partly on the grounds of PPG13). Members resolved to grant planning consent and the proposal was referred to DoE who chose not to call-in the scheme. The petrol filling station and restaurant were given detailed consent in January 1995. Later that year, an application was made for two large retail units. These were called-in and so the applicant brought forward the hotel proposal as an alternative. Given the site history and the County's view that the hotel and public house "are broadly in accord with Policy TR1", the scheme went ahead. The main issue was an archaeological one that was resolved satisfactorily. The LPA subsequently refused the applicants request to substitute artificial materials for the proposed slate roof and natural stone cills.

10.78 It has been argued that many budget hotels are now in contravention of national guidance being, often, out-of-centre and sometimes in open countryside. They might be considered to be leisure facilities that should contribute to the vitality and viability of town centres and which should be accessible by alternative means of transport. However, arguments have been put forward to suggest that (budget) hotels do need to be considered as a special form of development.

10.79 These issues are highlighted by the two new out-of-town budget hotels in Cornwall; a rural resort area with relatively poor public transport and a need for better quality accommodation. The related issues are:
• what impacts have these developments had on the local area? and
• to what extent can (budget) hotels be considered as special cases?

Key findings

Local impacts

10.80 Budget accommodation, such as the two Cornish hotels, have generated concern in two planning issues; their out-of-centre locations and design.

10.81 In terms of location, both sites are clearly out-of-centre. Carnon Downs, however, has a good local bus service with buses to Truro and Falmouth every 30 minutes between 7am and midnight. The service is used by several of the staff. At Penhale the bus service is poor. Both sites have local rail stations within 2.5km but these are insignificant in terms of use by guests or staff. Probably over 90% of guests and 50% of staff come by car.

10.82 In comparison with major leisure facilities, budget hotel and restaurant uses are relatively low generators of trips. Even with the high occupancy rates of the hotels, they will only generate in the order of 32-40 trips per day (arrival and departure) on average (see endnote 53). The restaurant generates perhaps 85-100 trips per day on average (see endnote 54). Staff and services generate perhaps 40 trips per day. The Penhale planning application referred to an overall estimated traffic flow of 200/day. They are not major traffic generators in the same way as a multiplex cinema or other major leisure facilities referred to.

10.83 In terms of impact on the vitality and viability of town centres, there is some evidence from local hoteliers to suggest that some of the poorer quality, mid-range town centre hotels have lost business which may be construed as a planning impact on the vitality and viability. There may also have been some impact upon local restaurants but the operators claim that they have created a new market. (This has not been tested in the case study.) It is perhaps more pertinent to consider the opportunity cost of these developments ie the contribution they might have made to vitality and viability if they had gone into town. If vitality and viability relates to footfall and ambience, the impact of a small 40 bedroom hotel is probably marginal, the restaurant is potentially more significant.

10.84 The two projects have had positive impacts:

• additional jobs (55-65 jobs per site) with staff taken on locally and offered training in a national programme;

• initial investment of £2-2.5m but limited local purchasing;

• new, good quality accommodation has been provided in areas that have seen no other new hotels developed in recent years. It is believed this will help raise standards overall although this has been hard to define in the short term;

• some evidence of new markets being created through the attraction of branding (drawing
in loyal customers) and the growing appeal of budget hotels. Cornwall now gets (free) national promotion through the promotion of Travel Inns. The two hotels are currently attracting between 12 and 13,000 staying visitors per annum each (see endnote 55);

- the hotels represent an important element of the local business infrastructure. Just over 60% of visitors are on business;
- additional, good quality social facilities (family restaurants) for local communities; and
- longer term benefits of encouraging investment or reduction in inadequate accommodation stock are not yet clear.

10.85 With the exception of a site-specific issue of levels at Carnon Downs, design has not been a problem. Local materials have been used, landscaping requirements have been met. Branding has not raised any design issues. The general concern expressed by West Country Tourist Board (WCTB) about "standard and bland designs not related to local architecture and landscapes" has not been an issue in these two cases.

**Budget hotels; a special case?**

10.86 In economic development (tourism) terms, there is a national and regional need embodied in national and regional tourism development policies (see endnote 56) to provide more, better quality visitor accommodation in order to promote holiday tourism and enhance business infrastructure. The quality and price of new, branded budget accommodation attracts additional visitors and, often, new markets including those who may not have considered staying in hotels or in the area before.

10.87 The principles behind hotel development remain the same for budget accommodation ie "location, location and location" (see endnote 57). The potential guest will also consider price and other presentational factors but location is not a variable; it also heads the list of consumer choice criteria for budget hotels.

10.88 A survey of budget hotel operators (see endnote 58) reflected this pre-occupation with location. Motorway and major road access and relationship to a good business catchment were the first three development priorities. Hotels service travellers and business travellers - the main market for budget accommodation - are on the move regularly and need easy access to their main mode of transport. Some city centre sites (ie centres that have an adequate business catchment) are now popular, especially in vital and viable centres (see endnote 59). However, rising land prices are now slowing the recent trend of such developments that were only enabled by some astute purchases at the bottom of the commercial land market in the mid-1990s.

10.89 For the budget hotel developer, location is related to land value and the requirement to build to a fixed budget. The need to build to a specific budget is driven by room pricing which is an essential element of the final offer. Value for money tariffs are achieved through relatively low land values, standardised system-building techniques and providing limited ancillary facilities. (Strong branding is essential to sustain the high occupancies that are needed to make the budget concept work.) Modular building techniques have enabled development costs
to be minimised but this also places some restrictions on the scope for integrating developments on difficult sites in town centres e.g., lifts raise costs significantly as do detailing and special materials. Some operators have a fixed template in terms of construction and branding; others are more flexible. In both cases, the crucial issue is visibility and signage which can have planning implications at sensitive sites.

10.90 The role of the restaurant is crucial in budget hotel development. The usual combination of independent restaurant and hotel is driven by site value. The restaurant not only provides an essential service for the hotel guests but for most budget hotel developments of limited scale, the hotel element, on its own, could not justify the development. “The restaurant contribution makes the income/cost profile strong enough to make 40 rooms a viable size. This in turn enables the operator to build in what most hoteliers would see as marginal locations.” (see endnote 60)

10.91 Essentially, the quality of the location is paramount. For the developer, an inferior location in a town centre is not considered to be an option even if available at a comparable price to a good out-of-town location. Out-of-centre locations with good access and signage, therefore, often remain the only viable opportunity for budget hotel development outside the major centres. Whitbread made it clear that they would not have considered alternative sites within Truro or Newquay; the investment would probably have gone elsewhere.

10.92 Therefore, despite the current willingness of budget operators to develop in city centres, there are clear development constraints upon them doing so, particularly in small towns.

10.93 Ancillary or complementary restaurants are needed if the budget hotel developments are to go ahead. They do contribute to the local tourism infrastructure, serving residents and other tourists. Some form of restaurant is clearly needed for the hotel but the additional local traffic created, over and above hotel guests, in out-of-centre locations, is an issue.

10.94 WCTB normally encourage additional serviced accommodation only in areas of growing demand and preferably where served by public transport. However, it is their view and that of local tourism officers, that the budget hotel concept is consistent with meeting the wider market needs and provides a modern quality product that will encourage an overall increase in standards, albeit with some rationalisation. They are seen as providing a distinct new tourism product in the area that may benefit the local economy through providing employment opportunities and additional general tourism business.

Further issues emerging from the case study

10.95 New hotel development generally brings positive impacts, particularly where there is a need for additional or upgraded accommodation. However, in out-of-centre locations, they can have an impact on trip generation and vitality and viability of town centres. What are the policy implications for new hotel development?

10.96 There do appear to be special circumstances related to budget hotel development. There is a need for more, better quality visitor accommodation. Do the circumstances related to budget hotel development warrant a more flexible approach in terms of locational choice?
Case Study Summary: Caravan Policy In Great Yarmouth

Location and background

10.97 Great Yarmouth, on Norfolks east coast, is one of the UKs main seaside resort destinations and annually attracts around two million staying visitors. "Tourism is of major importance to the local economy both in the local economic activity it generates and the employment it provides." (see endnote 61) 75% of the local holiday accommodation stock is in holiday parks, chalets, caravan and camping sites.

10.98 PPG21, Annex B (Holiday and touring caravans) highlights the importance of caravans within the national tourist bedstock. The guidance advises LPAs "to investigate whether there are adequate facilities for both the touring caravanner to have reasonable freedom to wander and explore and for the static holiday caravanner to have reasonable choice of sites."

10.99 Three specific issues are raised in PPG21:

- LPAs should "examine the scope for encouraging holiday caravan site operators to improve the quality of their sites and to relocate sites away from particularly sensitive areas. In some cases, to facilitate improvement or relocation, LPAs may need to consider whether some expansion of the area covered by a site should be allowed, so that improved layouts and better landscaping can be implemented;

- divisions between touring and motorised caravans and tents are becoming more blurred. Developers are encouraged to be specific about overall numbers and LPAs will need to consider the implications of different types of unit. "But it should often be possible to grant a permission which allows flexibility between the numbers of tents and touring units within an overall limit on the number of pitches."; and

- "With better caravan standards and the trend towards tourism as a year-round activity, LPAs should give sympathetic consideration to applications to extend the opening period allowed under existing conditions."

10.100 The British Holiday & Home Parks Association (BH&HPA) is the main representative of the holiday park industry. BH&HPA has documented their current thinking on PPG21 and associated issues (see endnote 62). "PPG21, and in particular Annex B, have proved of immense value to the caravan industry. It is considered that the recommendations have provided a sensible balance between the needs of the caravan industry to meet its customers demands, and the needs of the LPA to preserve the environment."

10.101 The Association is opposed to any major change to this guidance, but recommends changes in emphasis ie:

- generally, "the principle of flexibility between touring caravans and tents and the issue of consents for touring units has now become much more widespread." The industry would like even more positive wording in PPG21;
the year-round use of caravans has increased significantly with the improved quality of facilities. Despite the economic benefits of a longer season, the industry is concerned that "some planning authorities still resist applications for parks to be allowed to be used for more than 10 months in the year and even in some cases for more than 8 months in the year. The fear of creating a residential use is the main problem in most cases. There is a reluctance to rely on holiday only conditions." The industry considers it "essential that the advice in Paragraph 9 of Annex B should remain coupled with the advice on seasonal holiday occupancy conditions in Annex C."; and

- from the industry's point of view, the expansion of sites is probably the most important provision within Annex B and still proves controversial with many planning authorities. It is stated that park owners need space to:
  
  o provide full facilities and larger and better caravans;
  
  o provide more spacious and imaginatively planned layouts; and
  
  o provide effective landscaping, both within and around parks.

Again, the industry would like the wording in PPG21 to be even more supportive.

10.102 There are now two other issues emerging which the industry feel should be addressed specifically in development plans and national Guidance:

- the need to allow for wardens residential accommodation on holiday caravan parks for better management and security reasons; and
- the need to provide for the relocation of caravan parks when this becomes necessary because of coastal erosion or coastal or river flooding.

10.103 The caravan industry perceives a resistance to holiday caravans in general and many operators in the caravan industry consider that LPAs are reluctant to offer the flexibility that is implied in the Guidance. The perception of the industry is that most development plan policies for caravans are restrictive and, where some flexibility is suggested in their wording, many LPAs have tended to take the more negative line in implementation.

10.104 Great Yarmouth Borough Council (GYBC), however, is one LPA that has taken a positive approach to some of the planning issues identified. The issues to be explored in this case are:

- can planning policy help realise national and local objectives to improve the appearance of caravan sites through site expansion? and
what are the implications of the other two issues raised in PPG21, Annex B ie the balance between tents and touring units and the extension of opening periods (and BH&HPAs proposals for wardens accommodation)?

Key findings

Policy formulation

10.105 The 'Prime Holiday Area' concept first appeared in Great Yarmouth in their Strategy for Tourism, prepared in 1988 in response to a concern about the loss of serviced accommodation and the need to encourage investment. Specific policies appeared in the Seafront Local Plan supported by the regional Tourist Board, the Great Yarmouth Holiday Association and Norfolk CC. The prime holiday areas were shown on the plan where there was "a presumption against any change of use of existing holiday accommodation within areas of prime holiday accommodation."

10.106 The following year, the policy was extended to holiday parks, chalet, caravan and camping sites. "Planning permission should be refused if (inter alia):

- The proposal would result in the loss of a site which makes a significant contribution to the stock of holiday accommodation;
- The site has potential for development and/or refurbishment to provide an improved level of tourist accommodation and related facilities ..; and
- The site is in a prime location for holiday use ie coastal, set in attractive landscape or close to major tourist attractions."

10.107 The prime site policy was included in various local plans as an amendment and later that year, Norfolk CC certified the above policy as being in general conformity with the then Structure Plan.

10.108 However, in the South West Area Local Plan dated 1990 (prior to PPG21), a new dimension appears, with the encouragement of improvement and the acknowledgement that such improvements often require expansion. "4.1.11 Due to changing market trends, it is important that the existing accommodation stock and/or the range of on-site facilities is improved. Improvements, whether for new accommodation, landscaping or the provision of new facilities take space which is sometimes not available within the existing site boundary. Also, in some cases, the investment required to finance major improvements can not be justified without increasing the sites visitor capacity. Whilst accepting that some extension to existing holiday sites is necessary to achieve an improved standard of accommodation, layout or facilities, it is important that landscape, environment and traffic considerations are taken into account."

10.109 Policy was amended to involve qualitative criteria ie "proposals should have regard to
meeting the English Tourist Boards minimum qualifications for grading. The layout should be interesting, based on the EATBs Caravanscape (see endnote 63) concept where appropriate. The choice of facing and surface materials and the use of colour will be dictated by the need to ensure that visual harmony is achieved both within the site and when viewed from outside the sites boundary.”

10.110 The policy was endorsed by EATB, the Broads Authority and Norfolk CC. At the Local Plan Inquiry, the Inspector "fully supported the prime policies and designations and no modifications were suggested." (see endnote 64)

10.111 For the Borough Wide Local Plan, members of the Planning Committee and local representatives visited all accommodation sites/premises in the Borough and identified which should be allocated as prime sites. The Local Plan went on deposit for public consultation in October 1995. The relevant policies are para-phrased:

- TR2: GYBC will seek to ensure a wide range of holiday accommodation. And encourage continuing improvements to existing provision;
- TR4: Proposals to change the use of tourist facilities to non tourist related facilities will not be permitted on sites of prime importance to the Borough's tourism industry;
- TR14: GYBC will permit developments which improve the range of good quality accommodation; and
- TR16: Extensions of the existing boundaries of holiday accommodation sites identified as being of prime importance to the areas tourist industry, that would involve development on the edge of or outside existing settlements or where the extensions would intrude into the open coast or countryside, may be permitted where such extensions are essential to justify or facilitate the provision of visitor facilities for the site as a whole and such facilities cannot be accommodated within the existing boundary.

10.112 At the Local Plan Inquiry (December 1996), the Inspector considered objections and made recommendations which led to a number of deletions and additions to designations and the re-wording of policy by the LPA but the essential thesis of encouraging improvements remains central to the strategy. (He also recommended revisions to the proposed policy relating to the provision of permanent residential occupancy on holiday sites to make exceptions to the generally negative policy where it could be demonstrated that it was essential for good management or security.)

10.113 The modified version of the Local Plan (see endnote 65) was published in early 1999. The key policies have been adapted but retain the key strategic points:

- ensuring that a wide range of holiday accommodation is provided and encouraging continuing improvements to the existing provision;
- the definition and preservation of prime holiday locations ie sites "of strategic value and of prime importance to the Boroughs tourist industry"; and
• encouraging the improvement of the existing holiday chalets and caravan park stock and/or the range of on-site facilities. This may entail extensions in area and increasing capacity.

10.114 In terms of the other issues raised by the caravan industry, the Plan reflects upon the improved design and quality of accommodation provided by caravans. The LPA therefore "has no preference as to the type of new accommodation but will expect all future developments to be well laid out, landscaped and of a high standard of internal and external design and based on EATBs concept of Caravanscape." Unlike some other LPAs, GYBC welcomes changes from chalets to static vans. The view is that static vans are more versatile, easier to keep up-to-date and maintain with subsequent environmental advantages. The LPA has also shown flexibility between tourers, statics and tents; access is the only issue.

10.115 The Plan also points out that because holiday accommodation is not always suitable for all year round use, permanent residential occupancy must be controlled. In practice, GYBC used to interpret the season as 18 March to 31 October. This traditional approach has been superseded with a general policy that permits occupancy for all but six weeks of the year but with no single let of more than four weeks. This closure period is based on the premise that this is generally acceptable to the industry that wants to extend the season but still needs a maintenance period. It is also an adequate period in which to allow for enforcement. This period of occupancy has been tested and upheld on appeal.

10.116 The Plan addresses the issue of wardens accommodation in a positive way by allowing such permanent occupation "where it can be demonstrated that:

• it is essential for the good management of the site; or
• it is essential for the security of the site."

10.117 The Structure Plan of 1993 and the 1998 deposit version both have housing policies allowing for on-site wardens accommodation where the need is established. "In the countryside housing development will not take place unless. It is shown to be needed in connection with agriculture, forestry, organised recreation or tourist facilities." Policy H8.

10.118 The consultation process for the Local Plan showed that the policies were generally well received and supported; the general reaction from the industry has been positive. The key issue has been the criteria for designation as a prime site and the application of those criteria to specific sites. Operators felt that the LPA had not spent sufficient time considering individual sites. However, it has been shown that the strategy offers operators the opportunity to demonstrate that they should be designated as prime sites, or not, as the case may be.

10.119 In terms of wider benefits, there have been significant site and facility improvements. The advantages of the Caravanscape (see endnote 66) approach that involves informal, clustered layouts around more secluded courtyards with extensive landscaping and screening are becoming evident in both operational and environmental terms.
Policy in practice; Cherry Tree Holiday Park, Burgh Castle, Great Yarmouth

10.120 Cherry Tree Holiday Park is situated in the open countryside between the villages of Burgh Castle and Belton, approximately three miles south west of Great Yarmouth and about three miles inland from the coast.

10.121 The site has been established and gradually developed over the last 25 years:

- in the 1970s, there were applications for additional units and holiday tents, alterations and extensions to the central shop etc;
- in the 1980s, there was an application for a leisure complex including swimming pool, 32 statics in lieu of 62 tents, a Caravanscape layout for 48 units in 3 courtyards in lieu of 100 touring/tent sites, all within the existing site; and
- in the 1990s, proposals to replace 19 timber chalets and 15 touring caravan sites with 34 disabled access caravans in four courtyards.

10.122 In 1993, the site had approximately 330 static units and a small touring area. In 1996, proposals were submitted to revise previous permissions with modifications and additions to the leisure complex, an outside pool, all-weather sports area and 130 extra caravans in 19 Caravanscape courtyards in an extension to the north east of the site. The applicants also sought the variation of holiday occupancy conditions to reduce the closure period to six weeks.

10.123 The new units are being developed in 4-5 phases with extensive structural and internal landscaping (744 trees and 3,500 shrubs) and access modifications undertaken in advance. Much of the development (80+ units, outdoor pool etc) is now complete. Each phase involves additional units and some of the central facilities; the phasing was subject to a Section 106 Agreement. The proposals entailed an additional 12-15 full-time and 50 part-time jobs.

10.124 The overall development is considered to be a success both from the operators point of view (stronger demand for the site and premium prices for the new courtyard units) (see endnote 67) and the LPA (extensive landscaping/screening, more attractive layout, enhanced facilities and economic advantages).

Other PPG21 issues

10.125 The more flexible policy on seasonal occupancy introduced by GYBC ie extending the season to 46 weeks has been accepted and tested locally. There do not appear to have been any negative aspects to this change although it may become necessary to enforce the four week maximum let policy. (One identified side issue is that strict enforcement would discriminate against the many non-letting static caravan holiday owners who use their caravans every weekend.)

10.126 The application of the PPG21 policy on mixed units ie allowing flexibility between the numbers of tents and touring units has not raised any significant problems in Great Yarmouth. The main issue is invariably access capacity and capability that will always be dealt with on an
individual site basis.

10.127 The flexibility inherent in the GYBC policy on wardens accommodation has also been welcomed and, to date, had raised no problems. The new policy does not set down any specific criteria for assessing need eg size of site, range of facilities, operating season etc but it is considered that this may become necessary in the light of experience.

Further issues emerging from the case study

10.128 The Great Yarmouth tourism industry is dominated by the caravan sector. Many other LPAs may not feel that the conditions are similar and so the principles of the approach may not be transferable.

Case Study Summary: Fountains Abbey; A Rural Attraction

Location and background

10.129 Fountains Abbey, a world heritage site, is situated in North Yorkshire, 4 miles west of the small market town of Ripon, just within the Nidderdale AONB. The site, which is owned by the National Trust (the Trust), covers 333 hectares. It comprises the ruins of Fountains Abbey - Britain’s largest and best preserved monastic ruin, Fountains Hall - an Elizabethan mansion, and the Studley Royal Estate which includes an eighteenth century water garden and a medieval deer park. A new visitor centre with a shop, restaurant, theatre and parking was completed in 1992. Apart from the deer park and the visitor centre, the attractions are all contained within the steeply sided valley of the river Skell.

10.130 Visitor numbers in the 1980s were up to 289,000 a year and prior to the development of the visitor centre, Fountains Abbey experienced considerable congestion and visitor management problems, largely because of the valley location and the lack of facilities ie:

- access to the site was through the village of Studley Roger or along narrow country lanes to the West Gate. Considerable traffic congestion resulted;

- coach access was particularly difficult. To reach the Studley Roger parking area, both the village and an historic arch had to be negotiated. Access to the West Gate was hard to negotiate in a full size coach;

- visitor routes around the site ran only along the valley floor, creating pressure on an environmentally sensitive area and the congestion was reducing the pleasure of peoples visit;

- refreshment facilities (20/25 covers in a small tea-room at the West Gate and a small kiosk in the summer) were inadequate but there was no scope in the valley to add more;

- the provision of WCs was totally inadequate for the number of visitors and those facilities that existed were in poor condition;

- the car parks (60 spaces at West Gate and up to 150 at Studley Roger) were frequently
oversubscribed; and

- people with disabilities had problems finding a suitable parking space.

10.131 The new visitor centre with 240 cover restaurant, a 100 seat theatre, a shop, WCs and parking for 400 cars and 12 coaches was developed to try and solve these problems. It is situated away from the valley floor but in easy reach of the Abbey and the Hall. The objectives were an improved environment and enhanced visitor enjoyment, rather than increased visitor numbers.

10.132 Fountains Abbey is currently the second most visited pay for entry site in the Trusts ownership. It is open throughout the year. Information collected by the Trust indicates that:

- in the 1990s, visitor numbers to the paid for areas of the estate varied between 275,000 and 311,000 (the deer park may be visited free and is estimated to attract an extra 100,000 pa);

- the modal split for visitors is estimated to be some 90% car, 9% coach and under 1% each by bicycle and by bus;

- visitors tend to travel further than to other Trust properties. 50% of visitors are staying overnight in the area, and the remainder live throughout Yorkshire; and

- the busiest period tends to be July and August when numbers can reach 40,000 visitors in a month. Sunday is the busiest day with an average of 2,000 visitors; on three or four occasions a year figures can reach 4,000/day. (Figures are very dependent upon the weather.)

10.133 The problem of how to encourage visitors to come to Fountains by public transport has clearly been difficult. A variety of buses and routes have served Fountains Abbey over the last two decades but the number of visitors using these services has remained consistently low. This is despite the active involvement of the Trust and Harrogate Borough Council (HBC) - both of which are committed to encouraging sustainable transport - in promoting the service over the last few years.

10.134 Fountains Abbey is a non-footloose attraction located in rural surroundings. This case study highlights the issues for such sites of:

- dealing with the impact of visitors to a rural heritage site; and

- attracting visitors by means other than the car.

**Key findings**
Resolving congestion

10.135 The development of the visitor centre at Fountains Abbey successfully resolved the congestion problems that were occurring both on and off the site.

- traffic congestion no longer occurs now that the main access to the site is from the B265 between Ripon and Pateley Bridge;
- there is now no need for coaches to park at either Studley Roger or the West Gate because 12 spaces are available at the centre;
- congestion and pressure on the environment of the valley floor have been reduced because it is now possible for visitors to undertake a circular walk along the valley, returning through the deer park to the visitor centre;
- good refreshment and other facilities are provided by the restaurant and the new WCs;
- car parking facilities have been increased and there is a maximum of three days in a year when the car parks are full;
- people with disabilities are given priority at the West Gate car park, which is closest to the ruins of the Abbey; and
- the facilities appear to be used only in conjunction with visits to the Abbey and do not generate trips in their own right.

10.136 The impact of the increased visitor numbers generated by the new centre is difficult to analyse because these are dependent upon the weather and vary from year to year. The average annual attendance since the visitor centre opened has increased by 3-4% over the average for the previous six years. However, the Trust considers that the centre has increased dwell time significantly through the better facilities for visitors. The visitor centre has also won several architectural awards.

The difficulties of developing alternative means of transport

10.137 A number of buses have served Fountains Abbey over the last two decades. The Harrogate and District bus company experimented with several services:

- in 1980, it ran a service three times a day on summer Sundays from Leeds to Ripon via Fountains. On a good day about a dozen passengers alighted at the Abbey; and
- in 1984, it put on two routes: a weekday service in the school holidays from York to Fountains and a Wednesday service from Harrogate; neither generated sufficient interest to be viable.

10.138 In 1998, Fountains Abbey was covered by three bus services:
• a summer season leisure bus started in 1995, the Fountains Flyer, which ran once a day on Sundays and Bank Holiday Mondays from Bradford via Leeds, Pateley Bridge to Fountains Abbey and on to Ripon, Lightwater Valley Theme Park and Masham. This allowed 5½ hours at Fountains;

• a vintage bus which ran three times a day, 6 days a week (excluding Mondays) from June to September in 1998 between Ripon, Lightwater Valley, Fountains Abbey, Newby Hall and Norton Conyers (both historic homes). This allowed three or six hours at Fountains; and

• a year round twice weekly market bus which stopped at the turn off for the visitor centre on a round trip from Ripon. The bus gave the visitor three hours at Fountains.

10.139 Despite its name, Fountains Abbey was never the real target of the Fountains Flyer bus. Rather, it was established to provide access, particularly for walkers, to the Nidderdale AONB and it has proved very successful in this. This type of bus service, based on a single outward and return journey, is ideal for walkers who are able to undertake reasonably lengthy circular or linear walks in the five to six hour period between buses. However, it is not particularly suitable for an attraction such as Fountains Abbey where, although there is a considerable amount to do, the average visit lasts three to four hours.

10.140 Another disincentive is the Flyers circuitous route which, although scenic, takes almost twice as long as the direct car journey from Leeds or Bradford. At present, the Flyer offers no flexibility over timing although it would be possible to encourage users to broaden their activities by walking to or from Ripon, which includes a variety of tourist attractions including the cathedral and museum. However, the vintage bus offered the opportunity of visiting a second attraction but the operator found the route not to be viable. Possible reasons for this included high operating costs (a vintage vehicle requires both driver and conductor), poor weather in the season it operated, and the fact that one seasons operation was insufficient to build a market.

10.141 The Flyer was widely promoted by the Council, the Trust and the bus authorities and yet neither it, nor the vintage bus, have had an appreciable impact upon visitors means of transport to Fountains. From the information available (see endnote 68), it appears that of the 275,000 visitors to the paid-for areas of Fountains Abbey in 1998 some 0.2% came by public transport:

• up to 500 arrived by the vintage bus;

• less than 100 used the Flyer; and

• less than half again used the market bus.

10.142 The survey data from the Flyer and the information from the vintage bus operator suggest that the buses are being used by non car owners and thus may be having a small impact on the social exclusion experienced by those without their own vehicle.
Since the visitor centre was opened, the Trust has actively marketed to coach operators and group organisers. The number of coach visitors to the Abbey quadrupled in the mid 1990s. However, in line with the rest of the region, the figures stabilised over the last two to three years and currently stand at some 26,000 pa (about 9% of visitors) of which about 60% are educational visits.

The Abbey is an attractive destination for both overseas and UK bicycle tourers but it is estimated that on average less than ten visitors a day arrive by bike. (In 1998, new cycle racks were installed at the entrances.)

Further issues emerging from the case study

Developments at such attractions may be essential in operational terms and greatly improve the tourism facility with associated benefits. Can improvements or extensions to attractions in the countryside be justified if they lead to a significant number of trips by private vehicle?

It has proved very difficult to affect a change of mode to rural attractions. How can more visitors be persuaded to change mode of transport when travelling to rural attractions?

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11. An Analysis Of Background Issues

Introduction

11.1 The final two chapters analyse the key findings and issues identified in Sections 1, 2 and 3. This chapter focuses on the key issues identified in Section 1, drawing conclusions from the research on leisure and tourism trends and potential impacts (see endnote 1).

11.2 To assist readers, key issues are presented in bold italics and major conclusions in italics following the analysis.

Leisure and tourism background issues

Issue 1: Given the degree of change in the leisure and tourism sectors, does planning policy and control need to reflect a more detailed understanding of the sectors and current/future trends?

11.3 Economic, social and political changes are leading to growth and rapid changes in the leisure and tourism sector in terms of product types and requirements, user needs and patterns of use including means of access. In particular:

- Business Strategies (see endnote 2) forecast continued growth in leisure services expenditure over the next 10 years at 2.5% in real terms;
- demographic and social changes suggest there will be changes in the supply of leisure facilities, with a greater emphasis on providing for:
  - older age groups, although there is a blurring of some of the old boundaries between age (and sex) groups (see endnote 3);
  - more single-person households;
  - more women; and
  - greater security.
- political changes are encouraging the (sustainable) development of leisure and tourism for social and economic ends.

11.4 The leisure property development industry is seeking to adapt to this growth and diversity in the market with significant planning implications. For example, at present:

- third place locations for leisure consumption, away from home and work, are becoming more important as a location for social interaction eg the growth of restaurants, pubs and, increasingly health and fitness. It is also evident in the qualitative changes evident in cinemas and other leisure and tourism facilities including retail/leisure centres;
a strong female bias is emerging. Female customers are... "forcing a re-think of traditional male domains such as the pub, more and more of which are focusing on ‘female-friendly’ benefits such as food and clean toilets re-branding altogether and specifically being targeted to women drinkers as well as men" (see endnote 4);

there is a growing demand for accessible leisure and tourism products eg leisure parks, short-break holidays (and in-home leisure (see endnote 5)). This encourages use of the most flexible, secure means of transport, currently perceived to be the car (for those who have access to one), even for short, local trips; and

developers are looking to larger, mixed-use schemes in order to embrace the diversity of the sector and related trends.

11.5 These are the current trends but they will change, probably faster than other sectors, and planning implications will vary over time. The private sector holds the view that LPAs do not have a sufficient understanding of the leisure and tourism sectors to accommodate these changes.

C1. Both the private and public sector surveys indicated significant pressure for leisure development with attendant planning implications. It is important that planners are aware of these trends and their implications.

**Issue 2: Is the recent development boom in the sector likely to be sustained or will it diminish in importance in land-use development terms?**

11.6 There is a perception or implication from the research that the market is fickle and transient and, therefore, perhaps does not justify the same degree of consideration as other land-uses. Certainly, the commercial leisure property market is different from other sectors. It is in its infancy and still to prove itself and there have been concerns for its future eg:

- trading performance needs to be maintained to support high development costs and rentals;
- multiplex cinema development may be reaching saturation (see endnote 6); and
- planning policy is demanding changes to popular formats.

11.7 However, chapter 2 showed there has recently been a significant leisure development boom due, in part, to the growth in leisure expenditure and, in part, to changes and improvements in the product. Many agents consider leisure to be in a similar position as retail warehousing was a decade and a half ago. When the retail warehouse park concept emerged, it too was characterised by good quality tenants and greater attraction to shoppers and operators due to the larger critical mass of each development and the benefits between complementary, and even competing, retailers. Rental growth has also proved itself to prospective investors. In some cases, leisure schemes can be even more attractive than their retail equivalents, offering excellent security from both good quality tenants and long leases.
11.8 Commercial leisure property has emerged as an acceptable investment opportunity accompanied by a strong rise in prices and this has boosted development activity. Between 1992 and 1998, anecdotal evidence suggests that yields moved from 10% to 6.5%, or less (equivalent to a capital value increase of 55%+ before any uplift in rental values is taken into account). In part, this reflected the general downward movement in property yields, but also the increased attraction of leisure as an investment. Over a similar period, retail warehouse yields moved from 10% to 7% and overall property yields moved from 9.9% to 7.5% (see endnote 7).

11.9 Some companies like Marylebone Warwick Balfour, have created leisure funds which have capitalised on the positive characteristics of the leisure park sector. As the market has matured, established institutional funds, such as Norwich Union and Legal & General, have been more willing to back leisure schemes.

11.10 To summarise, increasing investor interest reflects a general change in attitudes to the sector, which is now seen to offer:

- substantial income security, from good quality tenants;
- a strong and durable growth industry for the future;
- quality flexible buildings in prime locations;
- long leases in comparison to other sectors; and
- expectations of continued rental growth.

11.11 The private sector survey undertaken for this research in the late summer of 1998 and updated in Spring 2000 confirmed the confidence in the market:

- 98% described the current market as strong or very strong;
- 52% specifically rated it as very strong;
- 3% rated it as reasonable; and
- None rated it as weak.

Over the following five years (from 1998) the expectation was that the market would weaken slightly. Despite this, very few of the companies who responded expected the market in their sector to be weak at any time over the next five years and none expected it to be very weak.

11.12 The tourism property market is more disparate, based on quite discrete but relatively well established segments.

C2. Given the recent and likely sustained future expenditure growth in the sector, leisure and tourism development is likely to continue at a high level, albeit probably not as high as in the
late 1990s boom. They are now important social, economic and commercial land-uses that are here to stay, deserving appropriate status in development plans and planning guidance, based on a thorough understanding of the sector and its planning implications.

**Issue 3a: Does planning policy need to reflect any special circumstances related to the impacts of the leisure and tourism sector or particular uses within the sector ie are all the economic development impacts understood and how much weight are they - and should they - be given in the planning process?**

11.13 Leisure and tourism development is now seen as an important driver in economic development. Development is often justified on the basis of these benefits which are reported to be significant. The ONS (see endnote 8) series on consumer expenditure shows that leisure services spending (catering, betting and gambling, education and recreational and cultural services), was 12.9% of total consumer expenditure at the end of 1999 in constant price terms and 13.6% in current price terms. Tourism accounts for between 4 and 5% of UK GDP (see endnote 9) and between 5 and 6% of consumer spending (see endnote 10).

**Job creation**

11.14 Job creation is a fundamental goal of urban and rural regeneration. As one of the fastest growing economic sectors, leisure and tourism have created a significant number of jobs in recent years. As PPG21 stated in 1992 "The tourism industry offers a wide range of jobs at all skill levels. It has a good record of offering early advancement for young people, based on proven ability rather than qualifications. It has also been effective in providing alternative employment as demand for labour in traditional sectors has declined."

11.15 There are no formal estimates on overall job creation in the individual, specified leisure and tourism land-use sectors. Table 11.1 presents the breakdown used by ONS.

**Table 11.1: Employment in UK tourism/leisure-related industries**

11.16 These jobs represent 7% of all people in employment. Tourism has accounted for one sixth of the net increase in employment over the last ten years (see endnote 11). Leisure and tourism are likely to continue to grow and make an important contribution to new job creation in the future.

11.17 Job creation in this sector can be difficult to measure and the different nature of jobs (part/full-time, supplementary, casual, seasonal) can be misleading. In addition, there are jobs in construction and indirect jobs resulting from the effects of visitor spending in the local area, as well as the impact of any new business buying in goods and services. For the industry as a whole, "The multiplier effect on employment alone is estimated to be 1.3 additional jobs for every one directly employed in the hospitality industry." (see endnote 12)

11.18 In urban projects (see endnote 13), secondary employment increased the total full-time-job equivalent (FTJE) employment attributable to the projects considered by almost 60%. In a rural context, diversification is a national policy (see endnote 14) and tourism has a major role to play. Tourism can offer a supplementary income to farmers and, in so doing, can help in the maintenance of the countryside - particularly in the more remote areas of Britain. Farm
diversification has grown significantly; over 40% of agricultural holdings undertake some form of diversified activity (see endnote 15) "contracting and tourism account for over 40% of identified alternative activities." Tourism activities include accommodation, (farm) attractions, rural pursuits (riding etc) and retailing (crafts, farm produce etc). Rural facilities tend to be smaller than their urban equivalents (hotels and attractions) but smaller locally owned establishments generate more local output, income and employment than their larger counterparts (see endnote 16).

11.19 Research by the Countryside Commission found that total spending by all visitors to the English countryside in 1996 was £10.5bn (see endnote 17) supporting 301,000 jobs. To these figures need to be added 53,000 indirect and induced jobs in the countryside. "The indirect effects of tourism expenditure, such as those operating through the purchasing chain for example, can be very significant but tend not to be recognised as tourism benefits." (see endnote 18)

11.20 Leisure and tourism jobs have been seen as poor quality jobs ie part-time, casual, low paid etc in comparison with others. This is no longer generally accepted in general or in comparison with other sectors. In their consideration of leisure development in London, LPAC (see endnote 19) reported that leisure is a modern form of economic activity that is more sustainable in regeneration terms than older forms of activity. For example, it can provide varied employment opportunities in terms of full and part-time, different skill levels and flexible work arrangements in terms of time of day and week. Training is taken increasingly seriously by the tourism industry and the ability to offer a range of jobs at a variety of skill levels is now seen as a positive advantage (see endnote 20).

**Image creation**

11.21 Another criterion for urban regeneration projects has been identified as positive image creation. "Tourism projects are often seen as a particularly important way of affecting image and behaviour. They tend to have a high profile often being associated with highly visible environmental changes. They can also symbolise in a positive way the changing function and fortunes of an area." (see endnote 21). This applies increasingly to whole cities as much as individual projects. In an internationally-competitive market, a strong, positive image is a crucial marketing strength for destinations. In particular, these include projects such as arts and sporting venues and tourism facilities including top class hotels, conference centres and major new attractions. In a few cases, commercial leisure buildings have been developed as feature buildings or to mark a gateway site cf Beckton, Dagenham and Kettering case studies.

11.22 The benefits of image creation are still largely subjective and difficult to predict. The evidence (see endnote 22) suggests that new publicly-supported tourist attractions (eg the Albert Dock in Liverpool), large hotels and conference centres (eg the Crown Plaza in Manchester) and marinas (eg Hull) have been used successfully in changing the image of the local area.

**Business infrastructure**

11.23 It is often overlooked that business tourism facilities such as hotels, conference centres and exhibition halls represent essential infrastructure, servicing the business requirements of
all sectors of the local economy. Few new hotels in the UK outside London are developed primarily for holiday tourism purposes; they rely on the business sector for their core business.

C3. Leisure and tourism developments are major contributors to GDP and can act as catalysts in local economies. It has been made clear at a national level that the UK must remain competitive in these sectors (see endnote 23). The leisure and tourism sectors are now seen as wealth generators, job creators and promoters of local entrepreneurship (see endnote 24). In both urban and rural areas, leisure and tourism have come to play a key role in initiatives to diversify and re-configure the economy.

**Issue 3b: Does planning policy need to reflect any special circumstances related to the impacts of the leisure and tourism sector or particular uses within the sector ie are there any particular characteristics of leisure travel and trips to different land-uses of relevance to planning?**

11.24 Reducing the need to travel, especially by car, is a key issue in terms of PPG6 and PPG13. It recommends that major travel generators should be concentrated in town and other centres well served by public transport in order to maximise accessibility by alternative modes of transport and, by implication, promote social inclusion. The growth of larger scale, out-of-centre leisure developments very often in locations that are relatively inaccessible by public transport - combined with the decline of some uses in town centres has made some types of leisure activity less accessible to those wholly or partly reliant on forms of transport other than the car.

11.25 PPG21 makes no reference to the fact that tourism is predicated on travel, generally by car or plane, to a distant location; the focus in relation to tourism appears to be on planning/traffic management for visitors after arrival at their destination. "Some people say that modern tourism like most other current economic activities cannot be sustainable in the strictest sense of the word." (see endnote 25) This research has not attempted to address this wider issue, it is based on the premise that tourism is an important activity, contributing economically and socially to the quality of life and that tourism is now promoted as national policy (see endnote 26).

**Leisure and tourism travel**

11.26 Tourism and leisure journeys account for around one quarter of all journeys, although average car occupancy is higher for leisure/tourism trips than for other purposes (see endnote 27) as users often travel in (family) groups.

11.27 There are other important factors that need to be taken into account in considering the impact of leisure and tourism travel. In terms of leisure travel:

- travel for leisure purposes is predominantly by car. The National Travel Survey shows that overall 64% is by car and 24% on foot. The user surveys at out-of-town leisure sites found 80%+ of users arriving by car (see endnote 28). (PPG13 seeks to facilitate multi-purpose trips and PPG6 refers specifically to the opportunities for linked trips eg para 2.26. There is some evidence in the literature (see endnote 29) and the case studies of specialist shopping as part of a cinema leisure trip, and of leisure trips linking restaurants with an
activity such as the cinema; however, there is little other evidence to date to support this aspiration.; and

- a large proportion of leisure trips are undertaken in the evening (when public transport is often restricted) ie outside rush hours and therefore less likely to contribute to traffic congestion.

11.28 In terms of tourism travel (see endnote 30):

- tourism travel is also predominantly by car. (UKTS (see endnote 31) shows 76% of all holiday tourism trips in the UK are by car, 68% for business tourism trips. For day trips, 57% of all trips were by car (see endnote 32)); and

- tourism trips are longer than the average (see endnote 33) and this figure has risen compared to the overall figure;

However,

- most hotels and caravan sites generate relatively low levels of traffic. Of the 22,069 hotels registered with a tourist board (see endnote 34) ie where there is data, the average size is only 21 rooms and the average stay is 2.7 nights. Tourism accommodation generates relatively few trips per unit compared with day trips from home (or holiday) bases;

- most attractions are small and generate relatively low levels of traffic. The average attendance at all 6,164 recorded tourist attractions in the UK is 66,000, but 66% of all recorded attractions receive less than 30,000 visitors per year (see endnote 35) and the many unrecorded attractions are generally very small ie <10,000 visitors per annum.

- most significantly, visits to attractions represent less than 10% of all day trips (see endnote 36). The latter involve trips to friends/relatives, entertainment, eating and drinking, walking, shopping as well as attractions. The majority of day trips, and their associated impacts, are to free-access sites such as open countryside, villages and towns, particularly those with good quality, speciality retailing rather than to formal visitor attractions; and

- many tourism-related facilities are rural based and/or not footloose, making it difficult to direct them to town centres or other locations accessible by a range of transport modes.

C4. Statistics on travel for leisure and tourism purposes are inadequate in many respects (see endnote 37), but on the evidence available, this sector represents around one quarter of all journeys and travel is predominantly by car. In leisure terms, this is ameliorated by the off-peak nature of most trips.

C5. Although a significant proportion of tourism facilities are not footloose and can not be directed to town or local centres, individual tourism facilities generate relatively little traffic.

C6. Visiting attractions such as museums, heritage sites, theme parks etc is one of a range of
leisure day visit activities. These trips to attractions represent just a small proportion of overall day visits which also include visits to towns, villages, the countryside, to see friends, participate in sports etc.

C7. Managing the growth in trips to existing free attractions or destinations presents a larger problem than controlling new developments. New development actually represents only a relatively minor driver in the perceived problems of tourism and its associated impacts, which are to do with a wider range of circumstances that are often not subject to development control and require a complementary range of non-planning responses.

Issue 3c: Does planning policy need to reflect any special circumstances related to the impacts of the leisure and tourism sector or particular uses within the sector ie are the environmental and community impacts perceived to be caused by leisure and tourism development understood and given due weight?

11.29 There is a range of identified potential impacts on the environment, positive and negative, associated with leisure and tourism development. These can be considered in an urban and rural context.

The urban environment

Vitality and viability of town centres

11.30 The vitality and viability of town centres is "easy to recognise, but difficult to define" "vitality is reflected in how busy a centre is at different times and in different parts whilst viability refers to the ability of the centre to attract continuing investment, not only to maintain the fabric, but also to allow for improvement and adaptation to changing needs". "Vitality contributes to achieving viability..." (see endnote 38). Clearly, it is difficult to dis-aggregate the contribution, or potential harm, that leisure can make to the overall status of a town centre.

11.31 The potential impact of leisure on the vitality and viability of town centres is quite different from retail in several ways:

- leisure has an evening focus and is central to the evening economy. It can assist with, and be the cause of, night-time security problems; and
- different leisure facilities are perceived to have quite different impacts. Some might be considered benign eg family restaurants, cinema, bingo etc. Their development (or closure) is readily taken as a net gain (or loss) to the vitality and viability of a town centre. Other facilities eg pubs are perceived differently, particularly when grouped together near a residential area.

11.32 A report on the impact of multiplex cinemas on town centres (see endnote 39) considered that multiplex development had had limited effect on town centres as 80% of the (39) town centres surveyed with a multiplex cinema development nearby had retained at least one traditional cinema. However, usage would have declined with subsequent impact on vitality of the town centre. Although half the centres lost one or more cinemas, it was reported
that in many cases, the existing town centre cinema would have closed in the face of any modern competition, town centre or out-of-centre eg Kettering. The report stated that "in the situations where town centre cinemas have closed, in many cases there was limited overall impact on the centre as a whole. The previous cinema building is frequently re-used for other leisure activities, such as pubs, wine bars, restaurants, bingo clubs or retail. These uses are reported to have contributed positively to the vitality of the town centre, in some cases to a greater extent than the previously under-used cinema they replaced." This point ignores the loss of diversity, a key element in the vitality of a town centre and the likely loss of a facility for those without access to a car.

11.33 Diversity is linked to the opportunity cost of out-of-centre development on town centres. Even if the town centre is not affected because it is sustained by other means, it may be argued that the centre would be that much more vital and viable if the development had occurred there. Even more important, in a rapidly growing market for leisure and tourism (particularly A3), there is a real danger that the potential impact on town centre vitality and viability of out-of-centre leisure, with its easy car access and parking, is being hidden. The impacts may only be felt when the latent demand is taken up by new supply and the competition for customers intensifies. In relation to the assessment of impact of retail developments, PPG6 notes the need to take a long-term view and points out that the full impact of the development may take some years to be felt (para 4.4). This would appear to be relevant to leisure too.

11.34 Out-of-centre developments may also have indirect effects, affecting the commercial incentive for leisure development in the town centre. In Bristol, for example, four out-of-centre multiplexes have been developed without one in the centre and, although the centre continues to thrive due to A3 and other D2 uses, the absence of a multiplex reduces the range of leisure uses in the centre and hence its diversity.

11.35 Although tourism uses are not referred to explicitly in PPG1 and are not among the key town centre uses listed in PPG6 (para 2.18), museums, hotels and conference centres are among the uses cited as adding variety (para 2.12) and hence making a contribution to the vitality and viability of town centres.

C8. To remain vital and viable (that is, successful and sustainable alternatives to out-of-centre leisure developments), town centres require constant renewing and updating of infrastructure including tourism and leisure facilities. Without this continuing investment, their competitive position will worsen, even though this may be disguised whilst growth in leisure spending is strong.

Amenity

11.36 There are many anecdotes about the impact of leisure/tourism facilities on public amenity. References are made to:

- disturbances associated with the operation of visitor accommodation and A3/D2 uses; late-night music, noisy plant, deliveries etc;
- noise and disturbance associated with traffic, particularly idling coach engines; and
• congestion; overcrowding; litter and wear and tear at local facilities.

11.37 From the literature review and the LPA survey, the main problem appears to be with A3 bars and night-clubs aimed at the youth market. The situation in many town centres is perceived to be one of too much vitality eg Ealing. The LPA survey and the boom in pub development suggest the problem is common to many town centres. However, there are other cases where the evening economy is perceived to have benefited from such town centre development and added considerably to local vitality eg Birmingham, Leeds and others are trying to replicate the situation eg Sheffield.

11.38 In some cases, tourism nuisance may be more of a perception than a reality. In a recent study of the impact of hotels in Camden (see endnote 40), there were only 16 complaints in a year from an area that included 68 hotels (9,451 rooms). Clearly, the scale of impacts needs to be monitored and managed. Other research (see endnote 41) suggests tourism operators are more anxious to maintain their local environment than other users. Many hotels have developed green management practices.

11.39 Clearly, there are environmental problems associated with the volume of visitors at particular places, not necessarily associated with individual developments. In Cambridge, there has been severe congestion at the drop-off point for coaches. In London, Westminster has taken extra powers to limit the nuisance caused by idling coach engines. Perhaps most noticeably, there is overcrowding at attractions like Westminster Abbey, the Tower etc. Overcrowding is a problem because it can result in increased risk of damage to a site eg Canterbury Cathedral nave, it can restrict peoples movement or view and, perhaps, most significantly, the ambience of a place can be undermined (see endnote 42).

11.40 Many local authorities have introduced visitor management initiatives, special controls and facilities to ameliorate such problems that are not directly related to individual developments.

Re-use of buildings

11.41 There are numerous examples of beneficial re-use of existing buildings from visitor centres in redundant churches (Chester, York) to hotels in historic buildings (The Calls in Leeds, Hotel du Vin in Bristol) and pubs/restaurants in all sorts of buildings. Some attractions are developed specifically in order to access and interpret a building. Many projects have involved listed buildings; that is the inherent appeal of such buildings to leisure and tourism developers. There is also evidence (see endnote 43) to suggest that tourism development makes a significant contribution to wider area improvement and upgrading eg Castlefield in Manchester, Hull Old Town and the Thames South Bank. Some building-led development can cause problems where it is out-of-centre eg the re-use of an historic building as a tourist attraction may preserve the building, but it may be inaccessible by alternative modes of transport eg historic country houses, wind and water mills in rural areas.

The rural environment

11.42 PPG7 states that "New development should be sensitively related to existing settlement
patterns and to historic, wildlife and landscape resources. Building in the open countryside should be strictly controlled. In areas statutorily designated for their landscape, wildlife or historic qualities, policies give greater priority to restraint." (para 2.3) This theme is integral to national and local policy and is generally accepted by a tourism industry that is keen to preserve its inherent resource. Notwithstanding, there have been various tourism developments in the countryside but no systematic analysis of impacts other than on a few individual sites. There do appear, however, to be a number of issues:

- large individual developments can change the character of an area eg accommodation complexes in the countryside or marina developments along the coast. A report by the then Nature Conservancy Council cited the latter as one of a number of threats facing wildlife in Britain's estuaries. Coastal caravan sites, many of which pre-date existing planning controls, can have a devastating effect on the landscape if not sensitively designed and located (see endnote 44). However, large schemes in the countryside are relatively rare and there is evidence to support the view that some can be planned in an environmentally-sympathetic manner. Centre Parcs have won awards for their environmental work;

- the position of caravans in the countryside is invariably contentious. Many holiday parks pre-date the planning system or are the result of poor planning in the distant past when little attention was given to landscaping, layout, colours, lighting, reflection and built infrastructure which now cause considerable concern. However, they are a vital part of the tourism infrastructure, providing for many social groups and making a very significant contribution to the rural economy. The caravan sector is now focused on environmental enhancement partly as a result of PPG21. New approaches encompassed in good practice documents for the industry seek to address many of the environmental/design issues (see endnote 45);

- in consultation for this research, some considered that the cumulative impact of many small developments is a more serious problem in the countryside than the larger developments eg the visual intrusion of inappropriate barn conversions, signage, retail and catering etc; and

- in a study (see endnote 46) based on 11 villages and small towns around the country, environmental benefits, which were directly attributable to the development of tourism, were harder to identify (than wider community benefits) but included visual enhancement eg environmental improvements, the conversion and re-use of redundant buildings and encouraging property owners to keep their properties in good order.

11.43 Environmental impacts, therefore, are hard to define. "The definition of what constitutes a problem is highly subjective and largely depends on the context and the view of the observer. It is also important to keep these problems in perspective as visitors are only one factor amongst many." (see endnote 47) Air pollution, changes in the structure of retailing and agriculture have probably had a greater impact upon tourism environments than the pressure of visitors. "Visitor pressure undoubtedly does cause problems in some places. In general, however, the problems are not yet widespread or chronic and, where they do occur, they are often highly localised in time and place." (see endnote 48)
C9. Tourism, in particular, is seen to highlight the difficulties in balancing development opportunities with potential harm to the environment as so much tourism infrastructure is in designated areas of the countryside and in sensitive (historic) urban destinations.

C10. The most intrusive, damaging environmental impacts are those related to:

- late night activity in an urban leisure context; and
- congestion and overcrowding in a (rural and urban) tourism context.

In leisure terms, such activity can be highly intimidating and is common in many town centres. In tourism terms, the impact of large numbers of visitors in a special setting can be intense; the wear and tear on infrastructure, the loss of solitude, the congestion and visual intrusion. However, "the problems are not yet widespread" and "are often highly localised"

C11. The leisure and tourism industry is not homogenous. It is highly fragmented in the nature and scale of land-uses. Development patterns, growth rates and related impacts vary significantly between different land-uses and in different areas. Planning policy is just one of a diverse range of potential policy responses to potential impacts. Others include licensing procedures and visitor management.

Community impacts

11.44 In community terms, the evidence of leisure and tourism impact is largely anecdotal. On the positive side, tourism has traditionally been considered to be a good thing as it broadens the mind by allowing for a mix of cultures. This may still pertain amongst some groups, although the experience from some destinations that have a lot of foreign language students would suggest the contrary. Tourism can also help sustain and provide new cultural, social, recreational and transport facilities that might otherwise not be viable. On the negative side, the main issues seem to be environmental; the noise, congestion, parking problems etc that are attributed to tourists. In urban areas, there is sometimes a concern about loss of local shops to souvenir and A3 uses, and the loss of residential accommodation through creeping conversion to holiday or business lets and the difficulty of controlling such change.

11.45 In leisure terms, development (commercial or public sector) generally has a positive impact. Many local authorities express considerable pride in the provision of a full range of leisure facilities.

11.46 The impacts can be highlighted in rural areas. A picturesque town or village can change in character as tea-rooms and souvenir shops take over from local shops. This can cause local resentment. "Some Cotswold villages, for example, have completely changed their nature in the past 30 years although it is difficult to know to what extent this is due to tourism and to what extent it reflects wider social and economic changes.” (see endnote 49) Very small communities may simply feel overwhelmed by the sheer number of visitors. The RDC study (see endnote 50) revealed a remarkably consistent list of complaints from local residents; parking, traffic congestion, trespass, litter and rising house prices. However, overall it showed
that:

- most settlements where tourism is significant gain considerable support for the viability of core services eg the village shop, post office, transport and other services. Support for other non-tourism businesses such as garages and builders can also be significant; and
- social and community life can also benefit but to a lesser degree (see endnote 51).

11.47 Arts, sports and leisure can make a valuable contribution to social inclusion (see endnote 52), helping to deliver lower long-term unemployment, less crime, better health and better qualifications. They can also help to develop individual pride, community spirit and capacity for responsibility that enable local communities to run regeneration programmes themselves. Conversely, the loss of leisure facilities can add to social isolation and exclusion.

C12. Leisure and tourism have a generally positive impact in community terms, contributing to cultural exchange and quality of life.

Endnotes
1. Planning obligations and a number of other minor issues were suggested in the course of background research. In consultation, planning obligations did not feature as priorities for change. Further comments are reported in Appendix V.
2. BSL, op cit
3. Traditional expectations for different sections of society ‘to act their age’ may hold less true as there will... "no longer be any social expectation constraining older generations from taking part in (almost) any leisure activity in which their younger counterparts are involved." The evolution of leisure, The Henley Centre, Consumer and Leisure Futures, Winter 1997/98
4. Consumer & Leisure Futures, op cit
5. Consumer & Leisure Futures, Henley Centre, 1998 inter alia
6. cf Warner Villages decision to review its cinema operations in Property Week, 2 July 1999; in some cases, there is already over-supply eg Dagenham/Barking case study. (Cinema trading is always subject to the quality of the film available and competition from earlier video releases.)
7. IPD Annual Digest 1999
9. Quoted in Tomorrows Tourism, DCMS, 1999
10. Tourism Intelligence Quarterly, BTA, Dec 1999
11. Quoted in Tomorrows Tourism, DCMS, 1999
13. Tourism and the Inner City, op cit
14. PPG7 (revised): Countryside; environmental quality and economic and social development, 1997
15. reported in Planning for Rural Diversification, HMSO,1995
19. Leisure Development in London, op cit
20. For example, between 1995 and 1997, the number of people in full and part-time education in catering and hospitality management increased by 12.4%. Between 1997 and 1998, the number of NVQ awards in hospitality subjects increased by 177% and the number of organisations involved in the Investors in People standard in the hospitality industry has increased by 42% in the last two years. British Hospitality: Trends and Statistics, 1999, BHA, 1999.
21. Tourism and the Inner City, op cit
22. Tourism and the Inner City, op cit
23. Tomorrows Tourism, op cit
24. Tomorrows Tourism, op cit
25. Tourism Towards Sustainability, op cit
26. Tomorrows Tourism, op cit
27. Average 1.9 people for leisure and 2.3 for tourism, compared to 1.6 for all trips: Focus on Personal Travel, op cit
28. See Bristol, Dagenham case studies
29. notably, Multiplex Cinemas in Shopping Centres, op cit
30. For definitions of holiday and business tourism, see Appendix II
32. UK Day Visitor Survey 1996, DCMS, et al
33. NTS op cit
34. BTA and tourist boards
35. Sightseeing, op cit
36. UK Day Visitor Survey, op cit
37. Leisure trips are difficult to segregate and define. Tourism trips need to be co-ordinated at a national level cf Tomorrows Tourism, p 16
38. Vital and Viable Town Centres: Meeting the Challenge, URBED, HMSO 1994
39. The Impact of Multiplex Cinemas on Town Centres, Nathaniel Lichfield & Partners, July 1996
40. Executive Summary of research undertaken by Llewelyn-Davies for LB Camden
41. Tourism and the Inner City, op cit
42. Tourism and the Environment; Maintaining the Balance, Dept of Employment, 1991
43. Tourism and the Inner City, op cit
44. Reported in Tourism and the Environment, op cit
45. Towards a design guide for coastal static caravan parks, op cit and Holiday Caravan Parks; Caring for the Environment, A Guide to Good Practice, ETB/BH&HPA/CoCo/National Caravan Council
46. The Impact of Tourism on Rural Settlements, op cit
47. Tourism and the Environment, op cit
48. Tourism and the Environment, op cit
49. Tourism and the Environment, op cit
50. The Impact of Tourism on Rural Settlements, op cit
51. Cases of good practice in community benefits are given in the report, Tourism in National Parks; A Guide to Good Practice, RDC/CoCo/CCW/ETB/WTB
52. Arts and Sport, Social Exclusion Unit Policy Action Team 10, DCMS, 1999
12. Planning for Leisure and Tourism: Conclusions and Recommendations

Introduction

12.1 This chapter focuses on the key findings and issues identified in Sections 2 and 3 of the report. Conclusions are drawn with related recommendations for the various parties concerned, notably:

- DETR and national planning policy guidance, looking in turn at:
- Leisure (PPG6, PPG13, the UCO etc); and,
- Tourism (PPG21); including
- Regional planning implications.
- LPAs and approaches to planning for leisure and tourism;
- the private sector; and
- some other relevant issues.

12.2 To assist readers, key issues are presented in bold italics; major conclusions are presented in italics and recommendations in bold following the analysis.

Recommendations for DETR

Leisure and PPG6

12.3 There is a general acceptance, by both the public and private sectors, of the objectives behind PPG6 and 13 and the plan-led process. However, the surveys and consultation clearly suggest that developers and operators find planning policy for leisure a significant constraint. They believe that delayed and inconsistent decision-making is curtailing the development of the sector and this results in part from the lack of clarity of elements of PPG6 (see Endnote 53).

Issue 4: How should PPG6 be amended to overcome the perceived inadequacies or lack of clarity in respect of leisure development?

12.4 There is a clear perception that developers are now looking towards town centre sites and seeking to address accessibility and other issues in the light of national planning policy. There are a number of industry quotes to the effect that town centre sites can be made to work for innovative developers with good sites, good parking and proximity to other leisure facilities. Developers claim they can be creative under the new planning conditions and appropriate schemes will evolve.

C13. On the evidence of the LPA survey, the review of appeals and a number of the case
Inconsistent decision-making is evident in studies, particularly in cases related to Bristol, Barking & Dagenham. Despite recent efforts to clarify key points, there remains uncertainty in certain areas. The research indicates that LPAs seek clarification on similar issues.

12.5 The inconsistencies and/or points for clarification are:

- the relative priority of locally-defined economic development objectives relative to other principles inherent in PPGs;
- the definition and means of assessing need and capacity;
- the relevance of scale and mixed-uses in leisure development and the relationship to PPG6;
- the need to provide access by different transport modes and the application of maximum parking standards of PPG13;
- the definition and measurement of town centre vitality and viability in leisure terms;
- the application of the sequential test (defining town centres and available sites); and
- the application of PPG6 to different leisure land-uses.

These points are expanded in subsequent paragraphs.

**Economic Development**

12.6 The rapid growth of leisure and tourism in recent years has prioritized such developments in economic development initiatives.

**Issue 5: How best can local economic considerations be balanced against the other policy priorities of social progress and environmental protection?**

12.7 Economic development is presented as a priority in many development plans. PPG1 (para 5) refers to providing for "the nation's needs for commercial development" within a sustainable planning framework.

12.8 Economic development has been justified for approving out-of-town leisure proposals in certain cases. For example, PPG6 guidelines indicate that out-of-centre leisure development is allowed in special circumstances in coalfields. Even the SoS has referred to "special circumstances" prevailing in the coalfields. Such decisions might otherwise be seen as contrary to PPG6 guidelines.

12.9 Such decisions may be inconsistent or misinterpreted by LPAs. Some LPAs argue that economic development should be considered alongside the PPG6 issues of vitality and viability, trip generation, and accessibility; that is, in certain cases.
circumstances, it can be an over-riding factor. In Wakefield, for example, economic development was the key objective of the adopted local plan. Paras 1.16 and 1.17 of PPG6 already allow for such development, provided there is a need and no suitable sites are available in the context of a sequential test. However, some LPAs interpret national policy to mean that virtually any out-of-centre regeneration is likely to be unsustainable regeneration.

C14. Economic development has been used in some planning application and appeal cases to justify out-of-centre leisure development, on the face of it contrary to the principles of PPG6. This illustrates an argument encountered, to the effect that economic development should be considered explicitly alongside locational factors rather than as a secondary issue as implied in PPG6 ie that economic factors should be given equal weight to other factors in planning for leisure - as in other areas of planning. This research has not found justification for a change of emphasis on locational policy in PPG6, but it is important to reflect the fact that one of the aims of the UK strategy for sustainable development (see Endnote 54) is the maintenance of high and stable levels of economic growth and employment.

R1. There is a need to clarify the role of local economic development objectives, alongside the other PPG6 issues of vitality and viability, trip generation and accessibility, within national planning policy guidance.

Need and capacity

12.10 Certainly before the recent Ministerial statement (see Endnote 55), there was considerable uncertainty in the public and private sectors concerning the definition and means of assessment of need in planning terms.

Issue 6: How should need be defined in leisure terms? How can needs assessments be prepared effectively and realistically?

12.11 Government policy and appeal decisions infer that simply to demonstrate physical capacity or demand in terms of available expenditure within the catchment area does not fulfil the requirement for need to be shown. The research shows that, in practice, need has encompassed, and been based upon, such factors as community preference (cf Kettering case study), market capacity (Norwich) and economic development priorities (Wakefield) (see Endnote 56). These assessments have usually been partial.

12.12 The opposition to out-of-centre development in Norwich was supported by evidence of capacity, the contribution of cinemas to the local economy and evidence that town centre sites were available. The use of surveys and specialist advice was innovative, and remains unusual. This allowed the authority to review developer estimates, and provide members with an informed critique.

C15. In considering need for leisure uses, it is important to consider a number of qualitative and quantitative factors including local leisure requirements identified by survey or other means (ideally in the context of a local leisure strategy), the market capacity within the defined area and other planning objectives eg economic development. It may be that local aspirations can not be met locally in market capacity terms and a (sub)regional review is required. Where need is established, relevant sites can be identified by the LPA in the development plan.
C16. A clear definition of the process of assessment will benefit both planners, who will then also have clear parameters against which to judge applications, and developers who can then operate with a greater degree of certainty in terms of the planning context.

**Issue 7: Should commonly-agreed means of need/capacity assessment be prepared for different leisure uses?**

12.13 There are certain categories of, mainly public sector, leisure land-uses to which standards of provision have conventionally been applied and to which public resources have been devoted in an attempt to meet the standard of provision or local capacity. These have been used as purely quantitative planning guides or targets for provision. For commercial leisure facilities, whose development is dependent on the market, capacity analyses related to a specified catchment area for the centre involved can be undertaken to put local demand/need into context in a rational, quantifiable way, taking into consideration both quantitative and qualitative (including locational/ accessibility) factors.

12.14 Estimates of potential demand/capacity for multiplexes played a central role in the Norwich case study. Various methodologies were used by developers to estimate potential demand. They gave different results and unsurprisingly tended to reflect the preferred answers of those who deployed them. Many seem to suffer from methodological flaws, however, and some approaches are more accurate than others. The need for appropriate means of assessment applies equally to other forms of leisure. Similar issues relating to health and fitness clubs, for example, are now emerging in Norwich.

12.15 There are problems with capacity assessments (see Endnote 57), particularly in a rapidly changing market (and there are resource implications cf Kettering case study). Market capacity can change significantly over the plan period. Notwithstanding this reservation 50% of the private sector respondents thought this type of approach would be beneficial and 41% thought it would not - methodologies need to be agreed nationally (for different land-uses) and assessments done (sub)regionally. The methodologies employed in Norwich and elsewhere eg Hampshire offer a helpful starting point but there is a need for further national research and consultation to define the optimum approach.

C17. It has proved essential to make estimates of need in order to plan effectively. In Norwich, such a process has led to the successful achievement of planning objectives. The absence of such planning in Wakefield has caused great uncertainty for operators.

**R2.** Clarification is required as to what other factors the definition of need should cover (in addition to market capacity in terms of available expenditure and physical capacity) eg the effects on local leisure provision.

**R3.** Need assessments by the LPA should aim to identify local requirements, set them against local capacity and identify potential sites in the development plan for key leisure uses for the plan period. The means of assessment should be made explicit eg a standards approach (for publicly supported facilities) or an appropriate capacity assessment (for other facilities).

**R4.** For commercial leisure facilities, whose development is dependent on
the market and discretionary spending, capacity analyses related to a specified catchment area for the centre involved should be undertaken to define likely demand in a rational, quantifiable way.

R5. DETR need to agree, in consultation with interested parties, the optimal means of need assessment in general and for different types of leisure use.

**Scale of development**

12.16 A key issue for planning is that of scale. Sites are not often available in the town centre for the scale of (mixed-use) development, including parking, that developers are now seeking cf Bicester case study. The pressure to increase the scale of developments is likely to compound this issue. At first, developers interpreted this situation as justification for out-of-centre development. Advice from the Government has emphasised that larger out-of-centre mixed-use proposals, such as leisure parks, will usually require dis-aggregation - unless it can be established that there is an essential need for the scheme or a relationship between the particular leisure uses which requires them to be located together. This is a complex, disputed relationship involving operational synergy and development economics.

**Issue 8: Are there functional relationships between leisure elements that require multi-use development and how should the planning system reflect any such requirement?**

12.17 Developers have claimed that there are various synergies between major leisure uses at multi-leisure destinations that encourage large-scale developments:

- that visitors want to use different facilities during the course of a visit;
- a range of facilities creates an attractive leisure ambience and raises public awareness of a site as a leisure destination; and
- a range of facilities can create a critical mass of attractions that has a wider draw with subsequent economic development advantages.

12.18 The user surveys and consultations indicate there are relatively few multi-leisure activity trips; there does not appear to be any evidence of an over-riding functional synergy between leisure uses (other than in combination with catering). However, the synergy whereby familiarity with a site encourages repeat visits, perhaps to different activities at different times, probably does exist. The visitor surveys appear to confirm this; there were frequent repeat visits to the leisure parks surveyed. Finally, it would appear self-evident that the wider the range of facilities, the greater the appeal of the site. However, it would appear that town centres are equally, if not better placed, to provide for these synergies without conflicting with the principles of sustainable development.

C18. The evidence suggests that most people do not visit more than one major facility and/or a restaurant in a leisure park on one visit. There does not appear to be a strong justification for large-scale leisure development schemes on the basis of inherent synergies. This finding would support the principle of dis-aggregation ie the application of the sequential test to each
major leisure element in a scheme.

**Issue 9: Given Conclusion 18, are there any other legitimate planning reasons to bypass the sequential test, thereby allowing uses to be grouped together in a development that would otherwise have been required to be disaggregated?**

12.19 Scale of development can dictate the financial viability of the scheme and, if the overall scheme is not viable, developers will not proceed. This may then have planning implications, notably:

- if an important element of a multi-leisure scheme is a community need and requires cross-subsidy eg a football stadium, arts complex; and/or
- if the scheme is an economic development priority (see Endnote 58).

Ideally, these criteria should be used only when there is an established need in the development plan.

**C19. The sequential test should apply to the individual elements of mixed leisure development schemes. However, there may be exceptional circumstances where financial issues justify the consideration of a large development or complex of facilities eg to allow for the cross-subsidy of a desirable but non-commercial element.**

**R6. Current policy relating to dis-aggregation of uses should be reinforced as a key principle of PPG6. Exceptions may be made to support an identified development priority.**

12.20 PPG6 identifies scale criteria (2,500m²) for the application of impact statements to retail developments, but not for leisure (see Endnote 59). The draft revised PPG13 sets a threshold for leisure parking and Transport Assessments of 1,000m². This threshold will cover all major leisure schemes, but will exclude most pubs and restaurants that can make an important contribution to the vitality and viability of town and local centres. (Para 2.22 of PPG6 refers to the pubs and bingo being appropriate uses in local centres.)

**C20. It is important that the potential contribution of small leisure facilities to the vitality and viability of town centres is acknowledged and encouraged.**

**R7. Leisure development (of all scales) should be directed towards an appropriate town or district centre in line with the principles of PPG6 and PPG13. This should be made explicit in future guidance. Development plans and other policies should reinforce the pre-eminence of town or district centres for all leisure uses, identifying, supporting and encouraging the development of features that give centres a distinctive or unique leisure focus.**

**R8. In accordance with PPG6, large leisure proposals outside town centres should be subject to the sequential test. Notwithstanding any EIA requirement, such proposals (over 1,000m²), whether or not they have**
complied with the sequential test, should also be required to prepare an impact statement and address leisure needs in the context of:

- the development plan, including economic development/community need;
- the potential impact on the vitality and viability of town centres;
- trip generation and accessibility of the development (as part of a Transport Assessment); and
- where necessary, the economic justification for the inclusion of cross-subsidising elements of the development.

**Accessibility**

12.21 A key issue for both public and private sectors is access and parking for leisure land-uses.

**Issue 10: How, or should, planning policy respond to the special access requirements for leisure land-uses? Are there special issues relating to accessibility to leisure development?**

12.22 Town centres generally offer the highest degree of accessibility by alternative modes of transport for most users, including walking (see Endnote 60). They provide better access for those without cars because they are usually the focus of public transport and thereby minimise the potential for social exclusion based on lack of access opportunity. Out-of-centre sites are less likely to have adequate public transport, particularly in the evenings, and so are even less likely to encourage a switch of mode cf Kettering, Barking and Dagenham and Bristol case studies. Out-of-centre sites with large quantities of free parking have the potential to damage the vitality and viability of nearby town centres.

**Issue 11: Does the (rural/isolated) location of a development site have any bearing on the issues of trip generation?**

12.23 It has been argued (cf Kettering, Bicester case studies) that focusing development in the town centre can be problematic in an area in which car use is high and public transport limited and likely to remain so under any plausible view of the future. From this perspective, town centre locations may reduce accessibility for many people in the surrounding area who will have longer journeys or journey times than would have been the case with an out-of-centre location. This is an argument that requires careful analysis of local conditions.

**Parking**

12.24 In practical and policy terms, one of the significant constraints on town centre leisure development is the availability of parking in town centres.
Issue 12: Do the patterns of leisure use warrant a more flexible approach towards parking? Will major leisure developments proceed with restricted levels of parking?

12.25 Current policy dictates that full/unconstrained parking provision is not permitted anywhere. However, developers who might be happy to go into town centres are clear that adequate parking is still needed in most town centre locations. In the Norwich case study, both town centre sites have extensive car parking. Most other successful town centre leisure schemes have the same eg Wakefields Westgate scheme.

12.26 The issue is magnified if the town centre site is in competition with an out-of-centre site with unconstrained parking. At present, many LPAs are applying lower (maxima) standards to town centre sites than for out-of-centre sites, disadvantaging the former (and apparently misconstruing the purpose of maximum standards). Draft revised PPG13 advises LPAs to consider this issue (para 33). The problem could be addressed by simply refusing less accessible out-of-centre sites but there may be other reasons for granting permission for such proposals. In addition, this does not overcome the problem of competition from existing developments. Standards for adequate parking levels for different forms of leisure development now need to be set as maximum levels (see Annex B in Draft Revised PPG13). Standards need to be drawn up at the appropriate level to prevent authorities using standards as a means of competing for developments or providing perverse incentives for development to locate away from town centres.

12.27 In the user surveys, accessibility was a key factor in the choice of leisure destination. Around one half of users in the surveys at the out-of-centre Hengrove and Dagenham leisure parks suggested that, if the same facilities were available in the respective town centres, they would go there without the car. This places even greater emphasis on town centre sites to maximise the potential of what public transport is available and allow additional car parking for leisure facilities if necessary.

12.28 Town centre leisure developments with adequate parking provision will still contribute to vital and viable town centres and, if the public transport is reasonable, meet the needs of those without a car although they may not contribute to the reduction of private vehicle trips. (The evening use of leisure facilities offers opportunities for dual use of existing parking facilities.)

C21. The research suggests that unless public transport in the evening is exemplary, it is unrealistic to expect leisure development to go forward in town centres without adequate car parking.

C22. There are clear arguments to support a flexible approach to the use of the private car and car parking for leisure:

- except in a few urban areas eg Central London, secure, high quality, regular public transport services are not always available for leisure users, particularly at night;

- in these circumstances, it is unrealistic to expect car users to change mode; and

- a large proportion of leisure activities are undertaken in the evening when traffic congestion is less critical.
R9. Emphasis should be placed on the importance of providing adequate town centre parking to meet the needs for evening (leisure) use and the need for LPAs to promote shared parking between uses operating at different times of the day as put forward in Draft Revised PPG13.

R10. Where out-of-centre leisure uses are permitted, the same parking maxima should be applied as to surrounding town centres.

12.29 Traffic Impact Assessments (TIAs) have been required for most major leisure and tourism developments in the recent past.

Issue 13: How can LPAs make sure that all accessibility issues are considered adequately? Should TIAs take on a broader role, as now proposed, assessing impacts on the wider objectives of PPG13?

12.30 Generally, TIAs have been devoted to an analysis of the capacity of adjoining roads and junctions in relation to the predicted growth of traffic rather than assessing the location and accessibility by all forms of transport including public transport, walking and cycling. For example, congestion and safety were considered the most important transport issues by the LPAs in the Kettering and Wakefield case studies.

12.31 Some TIAs did make assumptions about the net growth in trips and some did project modal split but they did not explicitly relate the traffic generation to the principles of PPG13 or consider the merits of alternative locations. In the Kettering case study, for example, a transport assessment could have considered the argument put forward that a town centre site reduced accessibility for many in the surrounding catchment area. TIAs sometimes refer to existing public transport services and related infrastructure shortcomings (like the need to provide adequate bus stop facilities at Kettering leisure park) but not the efficiency, quality or viability of such alternative means of transport in PPG6 or 13 policy terms.

12.32 The draft revision of PPG13 addresses these issues and now recommends that Transport Assessments be submitted alongside applications for major developments ie over 1,000m² for leisure developments. DETR intends to publish a Good Practice Guide on Transport Assessments by the beginning of 2001.

C23. In the past, traditional TIAs have been inadequate in assessing the impact of major leisure schemes in transportation terms.

R11. TIAs need to be changed to the proposed Transport Assessments rather than pure traffic impact statements, to address the wider issues of PPG13 in the local context and, in particular, including trip generation and ensuring a realistic choice of access to leisure land uses by public transport, walking and cycling.

Vitality and viability of town centres
Assessment of the vitality and viability of town centres is complex (see Endnote 61) and assessments of overall impact have been partial or non-existent cf Wakefield and Barking and Dagenham case studies.

**Issue 14: Can the contribution of leisure to the vitality and viability of town centres be defined and the impact of leisure development be assessed realistically?**

PPG6 (Figure 1) sets out a range of indicators for assessing the health of town centres that can be useful for assessing the likely impact of out-of-centre developments. The use of such indicators in assessing the impact of out-of-centre retail development is growing but there is little evidence that they are being used to assess the impact of out-of-centre leisure developments. The impact of leisure facilities in terms of their contribution to vitality and viability could be defined by reference to two factors:

- the contribution to footfall (and implied propensity to spend) from a given number of customers (an economic impact factor); and
- the more abstract contributions to local ambience (the indefinable buzz factor) and security by day and night (the environmental factor).

With only a few exceptions (eg Colchester and Rotherham appeals), it appears that consideration of the impacts of developments on the vitality and viability of centres have tended to be undertaken in little detail or, in the cases of Barking and Wakefield, incorrectly. In the former inquiry, the Inspector took the view that the retail function of the town centre was vital ie lively, so the potential impact in leisure terms was irrelevant. Given the requirement to consider the diversity of a town centre as a contributory factor to its vitality in the context of PPG6, this partial approach should no longer be acceptable.

There is evidence (cf Hengrove, Bristol and Barking and Dagenham case studies) that new leisure developments can increase visitation rates ie create new markets, due to modern attractive facilities in convenient and accessible locations. Given this growth, the impact of new out-of-centre leisure developments on the city centre will be ameliorated and the overall effect may be slight. However, in the case of Bristol, the four out-of-centre developments appear to have had an opportunity cost by reducing the potential of city centre development such that no multiplex cinema development has so far occurred.

Similarly, there is no evidence that the Kettering development has had a negative impact upon the vitality and viability of the town centre; the old cinema would have closed wherever the new facility was located and new A3 has been developed in the centre. However, consideration was not given to the opportunity cost ie the contribution a new cinema (and A3) could have made to the town centre. There was no attempt at analysing the overall impact upon the vitality and viability of the town centre (or the nearby Wellingborough town centre).

C24. Overall, there have been few attempts to assess trade diversion, impact on future investment, loss of diversity (or consider the opportunity cost of out-of-centre leisure developments, as is believed to be relevant in many of the case studies).
R12. Further research is required, at a national level, to develop a new approach to measuring the long-term impact of leisure developments on the vitality and viability of town centres.

R13. In the short-term, local research should include (potential) impacts upon:

- other leisure facilities in the local area;
- footfall (in the evening and during normal shopping hours); and
  - the diversity in the town centre, range of leisure facilities etc.

These requirements suggest an important role for town centre managers/planners in terms of data collection (PPG6 Annex C).

The sequential approach

12.38 The sequential test offers a rational, effective, general approach to planning for leisure, subject to the associated recommendations made in this report. However, there are certain aspects that require clarification (see Endnote 62).

12.39 The definition of town centre, edge-of-centre, district centre and out-of-centre sites has been an important issue in the assessment of applications by LPAs and at appeal eg Oxford appeal. Clearer definitions are needed as evidenced in the Norwich case study. Research into the definition of town centre boundaries (see Endnote 63) may inform the process of defining town centre boundaries and other sites for planning policy processes, although the boundaries produced by the research "are specifically not intended to define town centres for planning policy purposes."

Issue 15: How should town centre, edge-of-centre and out-of-centre locations be defined for leisure development?

12.40 Specific definitions of town centres and edge-of-centre areas would best be prepared in the context of the development plan (see Endnote 64). Appeal decision letters suggest that there are factors other than distance that are important to the definition of sites eg topography, location and relationship of other land-uses. There are too many site variables to be prescriptive in national policy. Guidance might be more helpful if it elaborated on relevant factors to consider.

Issue 16: What are the implications of a perceived shortage of sites for major leisure developments (in town centres)?

12.41 The key constraint identified by both the private and public sectors with respect to major leisure development was the lack of suitable sites, particularly in town centres. Given current planning policy, the private sectors desire for larger developments and, in some cases, the
LPAs desire to encourage large-scale economic development, it is clear why this is a problem.

12.42 Current national planning policy encourages development in centres and advises that the scale of proposals should be appropriately related in scale to the centre. This may require a smaller scheme than the developer proposes or the disaggregation of a proposal. To an extent, this may be happening; for example, a number of smaller multiplex developments have been developed and are being considered. However, in other cases, the diminished viability of smaller schemes (and other constraints in town centres) may well dissuade investors and curtail leisure development. Clearly, some LPAs have been persuaded to consider out-of-centre in order to avoid losing potential development. The alternative is for LPAs to work more pro-actively to assemble sites. A significant proportion of LPAs (one third) has already done this.

C25. There is a danger that the shortage of town centre sites will affect the future development of major leisure schemes in town centres.

R14. LPAs should be encouraged to plan for leisure and designate, or assist in the assembly of, development sites in the context of identified need.

12.43 The criteria for defining the availability of sites for development are unclear eg likely timing of availability, potential alternative uses, ownership constraints (cf Bicester case study and paras 4.56-4.57 of this report referring to appeals).

Issue 17: Should LPAs seek to control development that has satisfied the sequential test?

12.44 Within a town centre, there may be sound planning reasons for favouring one site over another if there is not the capacity to support all the proposed schemes. In such cases, sites should be identified in the development plan in the context of need. For example, in Norwich, there was a clear planning priority to gain the early development of the Riverside site. (Such decisions can only sensibly be taken in the context of an appropriate capacity assessment.)

Issue 18: Where catchment areas are extensive and overlap the city centre, can local, non-town centre leisure developments be justified?

12.45 In larger urban areas with scope for a number of major leisure developments, an alternative non-town centre eg district centre site(s) may be appropriate as it may offer better accessibility for suburban markets. It should be considered favourably only when, and if, the site is accessible by a range of means of transport, if the needs that would be served by a town centre development are satisfied and further central development will not be threatened by the new proposal. Consideration should be given to the respective catchment areas and geographical distribution of local residents (cf Bristol case study). To be in accordance with PPG6, any additional site outside the town centre should be located in, or on the edge of, a local/district centre well served by public transport. Again, such decisions can only sensibly be taken in the context of an appropriate need and capacity assessment at a strategic level. This would also provide some assurance to developers concerned about future competition from out-of-centre sites (cf Wakefield case study).
In all cases, it is important that the sequential test process is made transparent. In Kettering for example, PPG6 would suggest that town centre or edge-of-centre sites should have been considered for a (smaller) cinema, with or without the restaurants ie dis-aggregated land-uses, probably with shared parking, contributing to the vitality and viability of the town centre. There may well not have been alternative sites available in the town centre and a sequential test may still have led to an out-of-town site (with appropriate access), but the process was not made explicit.

**C26.** There are several points related to the sequential approach that require clarification. These issues relate equally to other land-uses subject to the sequential test. Their resolution might best be dealt with as a matter of general principle ie for all forms of development.

- **R15.** The definition of town centre, edge-of-centre etc locations should be undertaken at the development plan stage. Criteria and/or factors for consideration in defining the location of sites should be clarified eg walking distances, topography, physical barriers.

- **R16.** The meaning of availability should also be clarified, focusing on the criteria and/or factors for consideration in defining the availability of sites eg timing, development cost.

- **R17.** Where there may be scope for a number of major developments, (sub) regional market capacity studies are likely to be essential.

- **R18.** Evidence of the sequential test process should be made explicit in the planning application process.

**Different forms of leisure development**

The nature of leisure land-uses as defined in this report suggests that a number of catering, cultural and indoor recreation land-uses, currently not considered in the context of the principles of PPG6, should indeed be subject to that policy (Appendix II, Table A2.3).

**Issue 19: Should all leisure land-uses be subject to the policy and principles of PPG6?**

Unfortunately, there is little comparative data available on trip generation for different leisure land-uses (see Endnote 65), but other factors are also important. Some of these uses are considered below.

Traditional public sector leisure facilities are no different from commercial leisure facilities in terms of their planning effects. Swimming pools, leisure centres and theatres all generate relatively large numbers of leisure trips and require accessibility by all modes of transport. Equally, they can contribute significantly to the vitality and viability of town centres.

Restaurants and bars also make a significant contribution to vitality and viability, they can generate a significant number of trips and in particular - need to be accessible by all modes of transport. The location of such uses in town or district centres may depend on scale.
but the locational principles of PPG6 are equally relevant.

12.51 Roadside catering facilities, including development in the countryside, have been justified in the past to service the needs of travellers. Criteria were established for motorway service areas (MSAs) in Highways Agency Roads Circular 1/94 and PPG13, Annex A and for trunk roads in Circular 4/88. On 31 July 1998, Lord Whitty announced the return to a policy based on the provision of MSAs approximately every 30 miles.

12.52 Stadia and other large footprint leisure developments eg arena, snow-centres, would, ideally, also be located in or on the edge of town centres but often can not because of their site requirements. These ad hoc special uses - which often require enabling development - need to be considered on an individual basis in the light of economic development and other community needs as well as other PPG6 and PPG13 factors. (Accessibility is obviously a crucial issue in dealing with stadia and other large volume trip generators.)

C27. Notwithstanding differences in scale, there do not appear to be any overriding reasons to distinguish between different leisure land-uses in terms of locational policy. All leisure uses should normally be located in appropriate centres. Exceptions may have to be made for roadside catering facilities.

R19. Research is needed, on a national basis, into the trips generated by leisure land-uses in order to establish whether any further refinement to policy for different land uses is required.

R20. The principles of PPG6, the sequential test and related leisure policies in development plans should be applied to all forms of leisure use including traditional public sector leisure facilities.

R21. Where there is an over-riding case for roadside facilities to service long distance travellers, these needs should be identified in the development plan although sites in open countryside should be avoided if at all possible.

R22. Where there is an over-riding, established need for large leisure projects eg stadia that can not be accommodated in a town centre, this need and relevant site(s) should be identified in the development plan. If specific sites are not allocated, it should be made clear that the principles for out-of-centre developments set out in PPGs 6 and 13 apply.

12.53 The surveys revealed support from both public and private sectors for a new, separate, clarified PPG on leisure uses or a separate section within a revised PPG6 including leisure.

Issue 20: Is there a need for new or separate planning guidance for leisure?

12.54 A new PPG could draw together recent policy that has emerged from different cases and Ministerial pronouncements. All recent policy statements could be marshalled together under one cover.

12.55 However, the main issues in relation to planning for leisure are very similar to other town centre land-uses and so there is justification for presenting those issues in the context of a
revised PPG6 but with a much clearer distinction drawn between retail and leisure. Given the significant functional differences, leisure needs to be considered quite separately from tourism although there are some overlapping issues. (See below.)

C28. Planning policy guidance has a general acceptance in principle but needs clarification in a number of specified areas.

R23. Guidance should be revised to clarify the points of policy and principle rather than change the policies within PPG6 and PPG13. It should provide an up-to-date, clear focus for planning for leisure, addressing the key points identified in this report as lacking clarity.

12.56 The desire for "consistency and flexibility" is clearly a dichotomy not confined to leisure.

Issue 21: The private sector seeks both consistency and flexibility in policy application. Can this be achieved?

12.57 To achieve consistency, there needs to be a clear declaration on the various points referred to above and added to current planning guidance. Clarification should lead to consistency in decision making and, for example, help avoid the situation that arose in the Wakefield case study where a town centre operator felt he was safe from subsequent out-of-centre development.

12.58 Flexibility or variations from these established priorities for clearly defined reasons can be introduced but any variation needs to be presented as an explicit departure from policy and justified accordingly. At present, many inconsistent decisions appear to be based on individual interpretation, or rationalisation, of policy.

Regional/(sub)regional planning for leisure

12.59 The evidence from a number of case studies and LPAs is that regional planning guidance (RPG) currently contributes little to planning for leisure. In general the counties have done little planning for leisure with the notable exception of Hampshire County Council which has undertaken background studies for multiplex cinemas.

Issue 22: Is there a role for (sub)regional planning of leisure development?

12.60 Draft PPG11, which sets out the objective of developing a comprehensive spatial strategy for a region (and sub-regions if necessary), offers the potential for RPG to make a more significant contribution than in the past. Unfortunately, leisure does not have great prominence in the document.

12.61 There have been several cases of adjacent/nearby local authorities competing for schemes by allowing out-of-centre (sometimes publicly owned) sites for development cf the Dagenham/Beckton, Bristol, Kettering and Wakefield case studies. There is a case for reviewing need and capacity at a (sub)regional level to help avoid these situations which can lead to over-provision and wasted resources. This might be done at a county or regional level,
as appropriate.

12.62 Similarly, in the rural situations of the Kettering and Bicester case studies, where probably only one scheme would be viable and development in one location would pre-empt development in other towns, a careful planning strategy was needed. A (sub)regional review would secure the most appropriate development in the most appropriate location in terms of impact, minimise the overall need to travel and maximise accessibility by a variety of means of transport.

12.63 Regional co-ordination of relevant background and preparation of capacity studies should also offer considerable economies in undertaking such work.

*C29. Despite the need for (sub) regional planning for some leisure facilities, little has been done. There are opportunities to improve this situation through wider co-ordination at (sub)regional or county level.*

**R24. Regional planning guidance should make specific reference to the (sub)regional planning requirements for major leisure development.**

**R25. LPAs, particularly county councils, regional planning bodies and other stakeholders (including the private sector) should co-ordinate resources and prepare background research and capacity studies where appropriate.**

**The Use Classes Order**

12.64 The research reveals that the inability of LPAs to control changes of use between different A3 uses is causing considerable problems relating to amenity (see para 12.146).

**Issue 23: Is there a need to change the UCO in relation to A3 development?**

12.65 A number of problems related to the UCO have been identified in the research eg:

- changes from a café to restaurant then to pub or hot food take-away with attendant changes in character including the sale of alcohol and different clientele cf Ealing;

- the transport implications of changes to/within A3 ie changes to drive-through facilities; *(see Endnote 66)*

- the blurring of boundaries between A1 (sandwich shops) and A3. This issue has not been considered in this research but clarification is needed on the threshold at which a sandwich shop becomes a restaurant; and

- the D2 use class has also caused some problems with changes of activity within the use class but these are not widespread. There may be a case for nominating some D2 leisure land-uses as sui generis to avoid particular problems eg night-clubs, but the case for additional control is not as clear as with A3.
12.66 These issues are now the subject of a DETR research project to examine the wider amenity, environmental and planning effects of changes of use.

12.67 In response to the problems referred to above, the National Planning Forum (NPF) (see Endnote 67) recommended dividing Use Class A3 into:

- A3(i) sale of food for consumption on the premises;
- A3(ii) sale of hot food for consumption off the premises, including mixed-uses where part of the use of the premises is for consumption of food on the premises; and
- A3(iii) public house, wine bar or other establishment for the consumption of drink on the premises.

12.68 More flexibility does not necessarily mean more draconian control. Indeed, it may enable local authorities to grant consents that they would not have otherwise allowed for fear of a subsequent change within the use class.

12.69 A change to the UCO would be preferable to the proposal (currently being put forward in Ealing) to include policies in the development plan (or SPG) that would preclude changes within the A3 use class in a defined area ie central Ealing as:

- it can only be imposed by conditions on new development ie not to existing; and
- Government policy advises against imposing conditions to restrict changes of use between uses in the same use class;

C30. Changing the Use Classes Order, as proposed by the NPF, would appear to be a rational response to many of the issues experienced in central Ealing and elsewhere.

R26. It is recommended that the Use Classes Order (A3) is changed on the basis of the proposals made by the NPF.

Tourism and PPG21

12.70 National planning policy for tourism in the form of PPG21 is very different in style to PPG6 and it pre-dates PPG13. It is generally supportive of tourism, acknowledging its contribution to the economy and the wider importance of the industry. There has, therefore, been relatively little criticism from the private sector. However, both public and private sectors have suggested that it needs updating and clarifying. In particular, PPG21 needs to:

- clarify the special nature of tourism as a land-use in national planning guidance; and,
- highlight the potential costs and benefits of tourism in the light of recent research as summarised earlier in this report (Chapter 11); and
- review the special requirements of the main tourism land-uses; hotels, caravans and
issues of sustainability?

The nature of tourism land-uses

12.71 There appears to be some uncertainty in both the public and private sectors about the relevance of PPG6/PPG13 issues of sustainable development to tourism land-uses.

12.72 There is a view within both private and public sectors that tourism should be treated as a special case. Approximately two thirds of private sector respondents and one fifth of LPA respondents felt that tourism land-uses should be distinguished from other forms of (leisure) development. A number of specific attributes were referred to:

- some tourism uses have specific locational requirements (e.g., hotels) often related to rural (caravans) and/or natural/heritage resources (attractions);
- tourism uses cater for a more dispersed market than other (leisure) land-uses generating longer journeys i.e., there are differences between the environmental impact (trip generation) of tourism and leisure uses. (In PPG21, which pre-dates PPG6 and 13, this is not explicit);
- tourism impacts are often seasonal; and
- some tourism uses can produce wider economic and social benefits than other leisure uses, drawing in additional revenue from outside the area.

12.73 Some of these points need qualification and additions:

- tourism trips include both overnight and day trips. These longer trips are more difficult to control or manage if inter-regional;
- tourism includes (non-discretionary) business as well as leisure travel;
- many tourism facilities are in rural, sometimes isolated locations;
- most rural destinations and attractions can only be accessed by car. There is little chance of changing mode for many of these destinations without radical changes in public transport provision of the Fountains case study;
- leisure tourism is frequently motivated by attractions and destinations that are not foot-loose e.g., spectacular scenery and the built heritage; and
- tourism is not a coherent, discrete industry. It involves activities across a wide spectrum of other industries, many of which are not primarily created or maintained as tourism businesses e.g., retailing, transport, the open countryside, and the built heritage;
C31. Tourism activity and land-uses have a number of distinguishing features that need to be taken into consideration, particularly in relation to the sustainable development issues inherent in later guidance (PPG13, PPG6).

Potential costs and benefits of tourism development

12.74 Chapter 11 detailed the scale and nature of tourism impacts. The research has indicated that tourism impacts upon the local economy, the local community and the local environment are significant with further distinguishing features.

Issue 25: How best can economic development factors be considered alongside social and environmental factors in planning policy for tourism, and are there special circumstances to consider in rural areas?

12.75 In terms of the local economy/community, it has been shown that:

- tourism has, and can, create a large number of jobs in rural and urban areas;
- tourism developments can make a significant positive impact upon the image of a local area providing that they are well planned and managed;
- hotels and conference facilities represent important elements of local business (and social) infrastructure; and
- tourism can help support local community facilities; local shops, recreational facilities and transport that might otherwise be unviable.

C32. The growth of tourism is now promoted as national policy (see Endnote 68); it is an essential activity, contributing economically and socially to the quality of life, notably in rural areas.

12.76 In terms of the environment:

- tourism can make a positive contribution through environmental improvements, attractive new schemes and conservation;
- the large majority of tourism trips are generated by tourism destinations made up of an amalgam of land-uses. Formal tourism land-uses (attractions and accommodation) contribute to, but generate only a small proportion, of all tourism trips. The growth of tourism and its perceived impacts, therefore, are only partially to do with new tourism land-use development;
- there should be greater concern for the impact of the overwhelming number of (largely car-borne) day trips to free, open access destinations such as countryside honeypots, historic towns and villages. The control of retailing, recreational activities (PPG17) and leisure -
particularly A3 land-uses - is more likely to have an effect on trip generation and congestion than is the control of the development of new tourism attractions; and

- rising affluence, socio-economic change and other factors encouraging travel to free access, attractive urban and rural destinations are the most important factors in the growth of tourism overall.

C33. Most individual tourism land-use developments have a relatively low environmental impact, particularly visitor accommodation, but the cumulative impact needs careful planning, particularly in the more sensitive designated areas, placing particular importance on capacity analyses for tourism development planning cf NW Region case study.

12.77 In terms of accessibility, the number of non-footloose tourism facilities in rural areas is a distinctive feature of the sector.

**Issue 26: How can more visitors be persuaded to change mode of transport when travelling to rural attractions?**

12.78 Controlling and changing the mode of trips to rural tourism facilities is difficult. The Fountains case study, and the experience of the National Trust elsewhere, is indicative. Despite considerable efforts, it has not proved possible to provide public transport that can attract more than a handful of visitors out of their cars. There may be scope to increase the numbers of people using public transport to visit rural sites but:

- services need to be directly and regularly linked to railway stations, centres of population, or tourist demand ie no need for passengers to inter-change;

- public sector support and effective publicity is required;

- initiatives require a long-term approach;

- the quality of service (speed, cleanliness, security etc) is vital;

- strategies must be tailored to the local situation; and

- new markets can be created for integrated days out eg rail/bus trips to Chatsworth and Hardwick Hall run by Midland Mainline.

C34. Local (green) transport plans are central to visitor management plans that should become increasingly important at tourism pressure points.

C35. The special nature of tourism activities, land-uses and impacts, as described above and reinforced by consultees, means that visitor management in its widest sense is crucial to ameliorate the perceived impacts of the development of tourism destinations. Tourism land-use development is part of this multi-functional, but essentially planning, process.
**Issue 27: What is the potential role of visitor management/tourism strategies in the planning process? Is visitor management the responsibility of town planners?**

12.79 Visitor management plans can be highly localised. At Fountains Abbey, the National Trust has dealt successfully with most of the local impacts of car-borne visitors. Congestion and adverse environmental impacts in nearby villages have been reduced to low levels, and the Abbey has been made more pleasant for visitors.

12.80 Visitor management can be more complex and cover a wide range of functions and interests of Cambridge case study. It can involve traffic management, promotion of off-season and off-peak travel, physical or timed constraints on access, encouraging local involvement in the industry as well as development planning and control etc.

C36. As with leisure and the problems of A3, a multi-functional co-ordinating role is required that planners are well equipped to provide. Indeed, given the nature of tourism impacts, planning for tourism has to take on this wider perspective.

**Issue 28: What are the criteria for effective management of tourism planning?**

12.81 The tourism planning problems of Cambridge have required a wider visitor management solution with a number of implications for planning:

- there is an extensive and effective public policy framework for tourism planning and visitor management in Cambridge City and in the County, supported by sound background research. The strength of the policy framework derives from:
  - consistency between policy objectives. The statutory and non-statutory policies are mutually supporting; and
  - tourism policy that identifies specific targets and indicators; notably the agency responsible for achieving them, and puts in place monitoring and review mechanisms.

- there are several reasons for the successful integration of public policies for tourism in Cambridge:
  - the City Council's Environment Committee is responsible for all elements of policy and service delivery for tourism including planning and visitor management; and
  - there is a strong corporate culture amongst officers. Informal discussions are frequent and are at least as important as formal mechanisms;

- co-ordination between different parties is promoted since:
  - the general direction of policy for tourism is seen as mutually beneficial ie limiting growth in Cambridge and diverting visitors to other parts of the county;
  - there is a long-established culture of joint working between the local authorities concerned; and
  - since all the authorities are relatively small, they see advantage in combining and co-operating to share costs.

- despite the number of co-ordinating and consultative bodies and their widespread
acceptance, they are mainly driven by the local authority. Other stakeholders have been reluctant to take on a wider responsibility. Much depends upon personalities, people with sufficient ability, energy, enthusiasm and willingness to make a contribution.

12.82 Cambridge is special in terms of tourism and other economic pressures but so is their approach. Enormous effort has gone into the co-ordination of policy and the investment has paid off.

C37. Good background research and co-operation with different parties has led to the good planning of tourism in Cambridge. Potentially, such efforts can help avoid inappropriate proposals and wasted resources.

C38. Although the development of land and buildings subject to planning control plays only a partial role in the growth of tourism and its perceived impacts, the role of planning is still important. Land-use policy is important not only in controlling development protecting sensitive areas and promoting development areas - but it also has a positive role to play in terms of liaising with the industry, helping to identify need, allocating sites etc.

R27. PPG21 should be reviewed to bring it up to date and clarify a number of key issues. It should acknowledge and reflect the special nature of tourism land-uses and the principles of sustainable development.

R28. Planning guidance should emphasise that planning for tourism is not simply concerned with the control of new tourism land-uses but must involve the control of all land-uses and activities including tourism - that go to make a tourism destination.

R29. Major travel generators should be concentrated in town and other centres well served by public transport as proposed in Draft Revised PPG13 (para 24) but there should be flexibility for those tourist facilities whose location is not footloose.

R30. The potential costs and benefits of tourism developments need to be explained more fully in PPG21 with specific reference to:

- job creation and other economic benefits;
- environmental impacts, positive and negative; and
  - community impacts, positive and negative.

R31. As with leisure, there is a need to clarify the role of local economic development objectives alongside the other issues inherent in national planning guidance.

R32. Planning for tourism should focus, as a priority, on destination visitor management as the most effective means of controlling the diversity of
activities that generate trips and cause congestion. Visitor management should include both control of development and management initiatives to ameliorate impacts that are not subject to development control.

R33. In areas of environmental sensitivity (including designated areas), particularly where there is a concern about the cumulative impact of tourism development, such planning policy should be framed in the context of an appropriate capacity assessment.

R34. Planners should take a leading role in the initiation and co-ordination of appropriate partnership groups for effective planning and visitor management of tourism.

**Different tourism land-uses**

12.83 The research has identified a number of features relevant to the planning of individual tourism land-uses; hotels, caravan sites and attractions. The different land-uses have different impacts with specific location and access requirements. Hotels and caravan sites are already featured in separate Annexes to PPG21.

Hotels and serviced accommodation

12.84 Hotels are important in economic terms; they can create jobs, enhance the local image and represent important business infrastructure of the Cornwall budget hotels case study.

**Issue 29: What are the policy implications for new hotel development? Should the location of hotels be considered in the context of PPG6 and the sequential test? How can planning help resolve the perceived shortage of sites available for hotels?**

12.85 Overall, current planning policy is against development in open countryside, with development being directed to towns and villages. PPG7 seeks to integrate the Governments objectives to meet the economic and social needs of people who live and work in rural areas (as well as visitors) and maintain or enhance the environment. Notwithstanding, "New development should be sensitively related to existing settlement patterns". "The main focus of new development should be on existing towns and villages." PPG6 refers to hotels and conference centres as facilities that "add variety" to town centres and, by implication, can contribute to the vitality and viability of town centres. Unfortunately, there is a perceived shortage of sites available in town centres which is seen as a significant constraint on development. As with leisure uses (Issue 16 and C24), it is important to identify hotel development sites in the context of identified need.

12.86 In PPG21, specific guidance in respect of hotels is more ambiguous than in PPG6. Annex A recognises that hotels are "a specialised form of development", that they can provide economic benefit and that there are commercial locational requirements including the need for (out-of-town) roadside facilities. In addition, it states that "motel development in such areas (outside large towns or tourist centres) is not necessarily ruled out" (see Endnote 69). However, the guidance also states that "there is no special reason to apply less demanding policies to new hotel developments than to other types of development in the open
countryside.” There are concerns about design and open countryside development, and its associated development. The traffic implications of related restaurants must be taken into consideration (see Endnote 70).

**Issue 30: Do the circumstances related to budget hotel development warrant a more flexible approach in terms of locational choice?**

12.87 The conclusions in Chapter 11 and the case study in Cornwall highlight a number of special factors in relation to hotels:

- Most existing hotels are small and generate relatively few trips per unit (see Chapter 11). Most new hotels are budget hotels of 40-60 bedrooms with some three or four star (100-200 rooms) and some larger units (400 rooms+) in the major cities. Even in the latter case, trip generation by staying guests is relatively low; problems are more likely to arise from the ancillary uses, notably conference/banqueting facilities that can generate significant numbers of (largely) day trips in addition to the staying visitor traffic;

- accommodation is needed in rural and urban destinations to serve a variety of dispersed leisure and business uses. The location of visitor accommodation, in large part, is dictated by the local tourism resource eg an attractive destination for holiday tourists or the distribution of local businesses. Unlike leisure and other town centre land-uses, demand is not based on the resident population within a catchment area, defined by local access to the town centre. Accommodation is therefore not entirely foot-loose. In addition, uses such as B&B and self-catering cottages are often related to farm diversification and the dual-use of existing residences. For these reasons, it is more difficult to control the general location of visitor accommodation eg by directing it to town centres or other locations accessible by a range of modes of transport;

- hotels are predicated on users travelling from outside the local area, the large majority of whom have to travel by car, particularly to rural holiday and business areas. In many rural areas, car access is the only means of access (see the North West Regional case study);

- most hotels are part of the business infrastructure; unlike most leisure and holiday tourism trips, business trips are not generally discretionary; and

- there are regional and national needs for improved visitor accommodation.

For small-scale and budget accommodation:

- B&B is usually developed as a change of use ie it is not always footloose; and

- small new budget hotels can not always justify town centre development costs.

12.88 Larger hotels, particularly those with ancillary, major conference facilities and independent restaurants with related higher factors of trip generation can make a significant contribution to the vitality and viability of town centres. However, these facilities are often important contributors to the financial viability of the hotel project and, like mixed-use leisure
schemes, there may be an economic development or a community need for such facilities that needs to be taken into account.

C39. National policy currently encourages hotels to be located within existing settlements and at locations accessible by alternative means of transport. This should remain the ideal with all new hotels directed to town or local centres where possible. Where this is not an option, the special features of budget hotels suggest that flexibility in location may be justified in order to meet other objectives.

R35. Large hotels should be treated as town centre uses and subject to PPG6 and the sequential test. Major conference facilities and independent restaurants that are not ancillary to the main use should be considered separately. LPAs should be encouraged to identify and/or assemble hotel development sites in the context of identified need.

R36. Small hotels need to be treated more flexibly by virtue of their special characteristics although they should be encouraged to find sites in town and district centres or, at least, built-up areas. Consideration needs to be given to the appropriate criteria for classification; this might be around 40 rooms but needs to also take into account the range and scale of ancillary facilities.

Caravans and other self catering accommodation

12.89 Caravans are often seen as environmentally intrusive as most are, and need to be, located in a rural, attractive environment. Caravan sites are, therefore, not entirely footloose.

12.90 Many caravan operators are keen to enhance their sites with better landscaping, more open space and improved facilities but need to expand in order to incorporate and finance such improvements. (There is little pressure overall for new caravan sites.) PPG21 (Annex B, para 8) encourages such improvements but the industry reports that this policy is not being implemented universally.

Issue 31: Are the principles of encouraging site improvement of caravan sites, through managed expansion, realistic and effective?

12.91 The Prime Site policy in Great Yarmouth, whereby designated sites can seek to extend their site to support the development of improved facilities and environment, has pro-actively addressed this key issue in an original, constructive way. The policy stemmed out of desire to restrict loss of caravan accommodation but it has emerged as a successful means of encouraging more and better quality investment. Site improvements have been achieved but the costs involved mean that such development can, generally, only be achieved in the context of growth.

Issue 32: Should the positive approach taken by Great Yarmouth be considered an exceptional case given the scale and nature of existing caravan development?

12.92 The evidence suggests there is room to develop the Great Yarmouth model further and use it elsewhere, refining the criteria and classifying sites and locations accordingly in more
qualitative and quantitative detail. Great Yarmouth is exceptional in that caravans provide a
very large proportion of local holiday accommodation and make a significant impact on the
local landscape. However, Great Yarmouth BC (GYBC) is equally committed to enhancing the
local environment and supporting the local tourism industry.

C40. There appears no reason why the principles of Great Yarmouth’s improvement policy for
existing sites GYBC do not encourage new development cannot be transferred elsewhere.

R37. The policy emphasis should remain on improvements to existing
caravan sites and relocation rather than the development of new sites,
unless justified in the context of a local or (sub)regional capacity analysis.

R38. A stronger endorsement of the current principles in PPG21, Annex B
would be justified, stressing in particular, a change in emphasis of control
from scale to quality ie the positive benefits of environmental and facility
improvements often outweigh any perceived problems of a marginal
increase in site area. Similarly, relocation of caravan sites away from
sensitive areas should be encouraged where there are real environmental
advantages.

12.93 Seasonal and holiday occupancy conditions on self-catering visitor accommodation,
particularly new high quality units in the countryside, are subject to market pressures to
become full-time residential. There have been criticisms from the caravan industry that the
more flexible policies related to seasonal occupancy outlined in PPG21 Annex C have not
been implemented.

Issue 33: Should planning guidance for holiday accommodation be strengthened to
meet the problems of seasonal and holiday occupancy conditions?

12.94 Again, the (limited) evidence from the Great Yarmouth case study indicates that the
policy in Annex C can be implemented successfully.

12.95 The caravan industry is also seeking greater flexibility in the provision of wardens
accommodation on caravan sites. It has not been possible to assess this issue in the context of
this research.

12.96 Several LPAs expressed concern that planning permission was not required for the use
of residential accommodation as holiday lets and about the consequent loss of permanent
residential accommodation. Concerns were expressed about the difficulty of distinguishing
between hostel uses, bed and breakfast accommodation and hotels and the effect that the
growth of the former uses were having on the character of the area and the local economy.

Issue 34: How should planning guidance respond to perceived problems with the UCO
for tourism land-uses?

12.97 Again, it has not been possible to assess this issue in the context of this research.

R39. Further research, at a national level, would enable further consideration
to be given to:

- seasonal and holiday occupancy conditions;
- the provision of wardens accommodation at sites that are permanent or open throughout the year; and
- changes of use between residential and holiday accommodation.

**Attractions**

12.98 Visitor numbers at attractions need to be put in perspective. As pointed out in Chapter 11, visits to attractions represent less than 10% of all day trips (see Endnote 71) and most tourist attractions attract considerably less than 30,000 visitors per year (see Endnote 72). There are larger attractions that achieve significant visitor numbers ie 420 sites (7%) attract over 200,000 visitors of which approximately 100 (2%) attract over 500,000 visitors. (A 12 screen multiplex attracts around 800,000-1,000,000 visitors pa).

12.99 A large proportion of attractions in the UK is not footloose; historic properties and gardens represent over 30% of recorded attractions but natural features, workplace attractions and site-specific museums probably raise the proportion of fixed attractions to nearer 50%. Many are located in rural, inaccessible locations eg Fountains Abbey. Of the 420 large attractions, it is estimated that only 160 might be considered footloose (see Endnote 73) and around 190 are rural based (including 107 country parks) (see Endnote 74).

12.100 Owing to the lack of any alternative, the vast majority of trips are currently by private car. There have been attempts to promote rail (eg Tamar and Tarka lines in the West Country), leisure buses (eg Surrey) and cycle trails around the country for tourism purposes but the overall effect has been modest. Many of the projects seeking to develop sustainable tourism (see Endnote 75), like Fountains Abbey, have had limited resources. The absence of alternative means of access has implications for social exclusion as well as trip generation.

12.101 Many new attractions have been approved in recent years following lottery funding although the number is now declining. PPG21 recommends the identification of suitable general locations and criteria for assessment for major tourism developments. However, there have been only a very small number of new projects with large, generally rural site requirements eg theme parks, major holiday villages, and cases have usually been treated individually (with or without individual Environment Assessments). Set criteria have proved unnecessary.

C41. The important distinction for planning purposes is between footloose attractions such as museums and galleries and the large proportion of attractions that are not foot-loose. Some of the latter are area-based eg local visitor centres, others are fixed eg heritage sites (cf Fountains Abbey case study).

C42. Many of the non-footloose attractions are in rural locations. Although most individual attractions do not attract large numbers of trips, when they are in rural areas, alternative means of transport are often lacking. The proportion of car usage to rural attractions like
Fountains Abbey is high. It is proving difficult, however, to effect modal change.

**Issue 35: Can improvements or extensions to attractions in the countryside be justified if they lead to a significant number of trips by private vehicle?**

12.102 This point is addressed in paragraph 24 of Draft Revised PPG13. This advises authorities to consider the extent to which a proposal situated near existing buildings, monuments, physical features or landscapes and which will not be well related to public transport, needs to be in, and have a meaningful link with, the particular location. Authorities are advised also to pay particular attention to the scale and arrangement of such proposals and to seek measures to improve access to the site by sustainable modes of transport.

12.103 Consideration needs to be given to the potential impact of ancillary facilities at these less accessible attractions. For example, many attractions are seeking to supplement their income by providing additional facilities like large shops, restaurants, conference facilities, over and above the functional requirements of an attraction. As identified with hotels and other leisure facilities, many attractions are reliant upon such trade for financial viability. Issues of economic development need to be considered.

R40. It would be appropriate to provide a separate annex or section in PPG21 to address the special features of tourism attractions.

R41. Large footprint attractions are relatively rare and should be treated on their individual merits in the context of the national and regional policy framework and subject to an appropriate EIA (with due consideration given to trip generation and alternative means of access) where appropriate. There is no need for national criteria specifically for large tourism facilities.

R42. Footloose museums, galleries and other tourist attractions that contribute to the vitality and viability of town centres, should be subject to the principles of PPG6 and the sequential approach test.

R43. Non-footloose, small rural attractions would best be dealt with in the context of a visitor management study and overall capacity analyses. Local policy on small attractions should reflect local conditions, set within the broad parameters of sustainable development.

R44. The existing commentaries on Locational factors in PPG21 need to be updated in the light of current policy (notably on urban centres and PPG6). However, the main focus should be upon the importance of careful assessment of need and capacity (see Endnote 76) at the appropriate level whether that is in an urban or rural context.

**Regional/(sub)regional planning for tourism**

12.104 Regional Planning Guidance (RPG) currently does not reflect the acknowledged importance of the tourism industry and has fallen short in terms of addressing tourism issues of
regional planning concern (cf NW Region case study).

**Issue 36: Could RPG give more weight to tourism issues?**

12.105 Draft PPG11 (see Endnote 77), which sets out the objective of developing a comprehensive spatial strategy for the region (and sub-regions if necessary), offers the potential for RPG to make a more significant contribution. Unfortunately, tourism does not have great prominence in the document. The new perspectives of RPG could be particularly important for tourism planning ie:

- sufficiently prescriptive spatial strategies; with
- relevant degrees of control; based on
- realistic analyses of capacity and need at a (sub)regional level;
- related to RDA strategies;
- incorporating integrated transport strategies; with
- a clearer relationship to external funding sources etc.

C43. Current draft guidance suggests RPG could offer significant benefits to tourism planning.

**Issue 37: How should the regional tourism planning priorities be identified and by whom?**

12.106 The NW Region case study indicated that RPG might add real value by undertaking an external, independent review of tourism sub-regions. A consistent, comparative study, across the region, could assess current tourism impacts, future environmental capacity and economic need for further tourism development (including appropriate farm diversification) in a land-use planning context. These capacity studies would define relevant *levels* or criteria for control or support for different sub-regions taking into account the availability of alternative locations (as referred to in PPG21) and local economic priorities ie a regional classification based on specific circumstances rather than generalised designations. (Not all National Parks or AONBs require the same levels of restraint, not all parts of the same designation need the same degree of control and not all resorts require the same level or type of support.) Local authorities would then be able to apply their own *means* of control within that broad context eg the scale of new accommodation development etc.

12.107 In tourism terms, these capacity analyses at a (sub)regional level are very important, particularly in rural, environmentally sensitive areas where it is important to gain an objective assessment of current pressures, capacity and need for different forms of development in different areas eg hotels, caravans and attractions. There is evidence from other regions, notably London, that regional guidance relating to hotel development has been helpful. It would also be important for resort areas (cf NW case study).

12.108 Tourism planning policy must be based on sound information at all levels; there is a
view that planning policy, notably in designated areas, is based on general misperceptions of
the scale and nature of visitor pressure. There is an already established need for more and
better tourism data (see Endnote 78) at a national level. However, there is a particular need for
more localised research in relation to planning impacts at a (sub)regional and local level. For
planning and visitor management, it is crucial that Regional Tourist Boards (RTBs), Regional
Planning Bodies (RPBs) and LPAs jointly and individually get a better understanding of:

- visitor profiles ie who the visitors are, where they are from, how they are travelling;
- the destinations and potential sensitivities ie how serious are the perceived or potential
  impacts in environmental and community terms and defining local capacities in these
terms; and
- how impacts are changing through regular monitoring (see Endnote 79). (Surveys could
  seek more detailed information on visitor spending to enhance the current methods of
  assessing local economic impact.)

12.109 PPG21 refers to the need for consultation between planning authorities and RTBs. In
the context of the above recommendations, this is even more important, along with co-
operation from other partners in research and policy formulation including the RDAs, RPBs, the
private and Not-For-Profit sectors, conservation agencies and other government departments.
Consistency of policy and co-ordination of implementation is crucial and is emphasised in the
Governments tourism strategy.

C44. There is a very important co-ordination role needed between the LPAs, RPBs, RDAs and
RTBs in undertaking these capacity studies and identifying other planning issues. There is also
a resource implication as the relevant issues will need research, analysis and monitoring.

Issue 38: Are (sub)regional capacity studies more than is currently anticipated for
regional planning guidance?

C45. The level of detail proposed may not be envisaged for RPG at present but it is required
for tourism planning, whether at a regional or county level, as recommended in PPG21 (but
rarely addressed).

R45. As in the leisure recommendations, PPG11 should specifically refer to
the need for regional guidance to include advice on tourism development
and advise that LPAs should co-operate at a (sub)regional level to identify
both need and capacity for tourism development.

R46. It is important that general controls on tourism development (including
in protected areas) are based on appropriate (sub)regional capacity studies.

R47. Wide consultation should precede the preparation of RPG so that the
capacity research and analyses can inform and be included within RPG, but
it should be an on-going process of planning and monitoring.
Issue 39: Will the integrated transport plans within RPG meet the need to control tourism trips?

12.110 The integration of transport plans within RPG adds considerable weight to the importance of regional guidance for tourism. For example, in the North West Regional case study, all parties would like to see improved regional public transport but, in rural Cumbria, tourism development is seen to be dependent in large part on enhanced road access. Such decisions need to be taken at a regional level.

12.111 However, strategic tourism development plans such as the promotion of West Cumbria and Furness and the Fylde resorts are dependent on good access, from outside the region. Tourism is predicated on relatively long, generally inter-regional trips. For example, the study of modal shift potential in the Lake District currently being undertaken will involve influencing travel decisions elsewhere in the region (and outside) as well as facility provision in Cumbria.

C46. Integrated transport plans need to take on an inter-regional dimension in order to control or manage tourism trips.

R48. There is a need for the integrated transport plans within RPG, in developing the proposals in the White Paper (see Endnote 80) on Integrated Transport Policy and recommended in Tomorrows Tourism, to meet the needs of providing alternative transport modes for both tourism trips to a destination (inter-regional trips) and day visits (intra-regional trips).

Recommendations for Local Planning Authorities

Leisure and development plans

12.112 PPG6 advises LPAs to undertake background studies, market demand/needs analyses, consultation with the industry and to identify sites for leisure as well as other town centre uses. Few LPAs are following this advice as evidenced in most of the case studies (Norwich was an exception) and in the surveys. In particular, few LPAs:

- refer to the sequential test specifically in their development plans;
- have allocated sites for leisure specifically. Site availability is a key issue;
- use public transport accessibility as a criterion for location;
- refer to social exclusion from leisure facilities;
- have parking standards expressed as maxima at all locations; or
- have policies or SPG for commercial leisure.

C47. Overall, leisure is not given the profile in development plans which is now justified by
development pressure and general policy priorities.

**Issue 40:** Planners are advised in Government policy to be co-operative and pro-active, to develop an understanding of the leisure market, to identify sites etc. What are the potential benefits of such a commitment? How can more LPAs be encouraged to take action? Are all LPAs in a position to apply the pro-active approach employed by Norwich City Council, for example?

12.113 Although a greater proportion of LPAs is undertaking relevant studies for their emerging plans, this proportion is still relatively low. In large part, it consists of surveys of existing facilities and limited analysis of need or capacity. The few assessments of need are based on community preferences (cf Kettering case study) and rarely address commercial leisure requirements. Norwich is a rare exception. Clearly, LPAs need to be convinced that the resource commitment will be worthwhile.

12.114 The evidence confirms the increasing importance of the leisure development sector and the complex potential impacts need careful assessment. However, the most convincing argument for action is the evidence of the results. Norwichs exemplary process has resulted in meeting all its planning objectives and, probably, significant savings in time and resources on unnecessary subsequent negotiations and appeals. In Ealing also, the pro-active approach towards the A3 amenity problems appears to have reaped dividends.

12.115 Clearly, there are resource implications. Considerable effort has to be expended by planning officers, often moving into unfamiliar territory. In some cases, external help must be sought as in Norwich; in others such as Ealing, planning skills have been extended to embrace wider, cross-cutting issues in-house. In nearly all cases, the background research is new and methodologies have had to be developed. Unfortunately, most of this work is being done unilaterally by individual LPAs, which is both more expensive and inefficient in cases where the research has a regional significance.

C48. There is not only a need but also clear compensating benefits for LPAs who plan pro-actively for leisure development.

C49. There is a need to develop commonly accepted methodologies and to implement research at an appropriate local or (sub) regional level to maximise resources and to plan most effectively.

R49. LPAs should be encouraged to work pro-actively in planning for leisure development, to undertake more background studies, market demand/needs analyses, consult with the industry and allocate sites for leisure uses etc. The benefits of such action should be reinforced in future guidance, the dissemination of good practice and the establishment of appropriate methodologies. (There is a strong case for co-ordinating assessments of capacity for commercial facilities at a (sub)regional level to avoid duplication by adjoining authorities and to focus resources and expertise.)

12.116 The private sector has identified the difference in time frames between development plans and commercial decisions as a constraint on pro-active planning by LPAs.
**Issue 41: Can the development planning process keep up with the speed of change in the leisure industry?**

12.117 This constraint does not undermine the purpose of such action; need and priorities should still be established in the context of the development plan. The key issue is the need to monitor and update as necessary.

R50. Leisure is a rapidly changing industry; it is particularly important that LPAs are pro-active and that studies are reviewed and updated frequently.

12.118 Few planning policies are specific to leisure and if they are, they usually relate to public sector and often do not refer to commercial leisure (with the exception of A3 land-use policies). Development plans often fail to recognise the social, cultural and economic value of different leisure uses. There are few explicit references to the community benefits that are sometimes presented by uses such as cinemas, bowling, bingo, pubs etc.

**Issue 42: Should planning policies be more specific to leisure?**

12.119 More LPAs are adopting general policies to promote development in urban areas at locations highly accessible by means other than the private car, and to locate major generators of travel demand in existing centres. In most cases, it is implicit that the policy applies to leisure development but this can be misconstrued, particularly when local leisure needs or economic development objectives conflict with general policy eg Bristol, Barking and Dagenham, Kettering, Wakefield.

12.120 In the light of their experience, Norwich City Council is currently reviewing its leisure policies for their revised local plan. In particular, they are making the sequential test more explicit in policy and/or supporting text, seeking to define the leisure land-uses to which it should apply and identifying specific needs and potential sites.

R51. Leisure needs more comprehensive and detailed consideration in development plans in the context of PPG6 and PPG13.

R52. Development plans and policies for leisure need to encompass commercial leisure development as well as publicly provided sports centres, open space, parks etc. PPG17 and PPG6 need to be co-ordinated in this respect.

R53. The leisure chapters in development plans need more explicit reference to PPG13, PPG6 and the sequential test. General locational strategies in this national policy context are recommended along with appropriate local locational strategies for specified leisure uses eg preference for town centres and leisure quarters within or adjacent to these.

12.121 Some LPAs may find SPG or adopted leisure strategies the most appropriate vehicle for detailed consideration of wider leisure planning issues in their area, including licensing issues.
**Issue 43: How useful is Supplementary Planning Guidance (SPG) as a tool for leisure planning?**

12.122 SPG is not widespread but is most common for A3 uses and is sometimes associated with the planning of leisure quarters. The evidence from the research is that SPG can be particularly helpful in marshalling information on local issues, objectives, policy and advice on discrete leisure themes such as A3 development (Ealing) or multiplex cinema development (Hampshire). In certain conditions, it may be appropriate to combine SPG on leisure with other (management related) leisure issues within an adopted leisure strategy.

**Issue 44: Does SPG offer sufficient flexibility within the constraints of the adopted development plan?**

12.123 SPG can be particularly helpful on a specific, local level. In Sheffield, the Action Plan for the CIQ is to be adopted for the same reasons ie marshalling policy but also to lend the necessary authority to the new/additional policy that varies from policy in the adopted UDP. Tolerance of new, local policy that is at variance with national policy/orders (eg the UCO in Ealing) or the adopted development plan (in Sheffield), will be greater if circumscribed within a formal planning area.

*C50. Given the time frames inherent in development plans, SPG offers the opportunity to provide a more flexible vehicle for new or amended policy, particularly in specified areas. This is particularly relevant to leisure which is subject to relatively rapid changes in development pressure.*

*R54. SPG should be used to provide a degree of flexibility in relation to the development plan.*

12.124 The availability of sites, notably in town centres, is the crucial issue for both the public and private sectors.

**Issue 45: Given an identified need, should site allocations be made specifically for leisure uses rather than as an optional use as occurs in some development plans?**

12.125 In the survey, although a majority of LPAs had allocated sites for mixed-use including leisure, far fewer referred specifically to leisure sites. In the past, this has proved to be a problem for leisure. Leisure as an alternative use for a site eg sites allocated for office or leisure use in the past have often meant property values dictating the end use rather than good planning. If leisure uses are to be incorporated in mixed-use schemes, this needs to be specified in associated development briefs with clear guidance on any specific leisure requirements (including amenity considerations).

12.126 Site identification should go hand-in-hand with the positive planning approach espoused. Needs and capacity studies need to be complemented by defined sites if planning is to be effective. The Norwich case study illustrates the point.

12.127 In terms of amenity, the definition of leisure sites within leisure quarters has proved
beneficial in many urban areas cf the Sheffield case study.

_C51. In order to plan effectively for leisure, there is a need to define appropriate sites specifically for leisure use within development plans._

**R55. In the light of PPG6, PPG13 and needs/capacity assessments, available, suitable and viable sites need to be allocated for the (different types of) leisure development proposed.**

12.128 There is an apparent misunderstanding of the purpose of maximum parking standards ie the meaning of para 4.6 in the 1994 PPG13 and para 2.30 in PPG6.

**Issue 46: Do LPAs need to clarify or reinforce the new approach to parking standards? What are the implications for leisure land-uses?**

12.129 Some LPAs have set maximum levels of provision in accessible areas, particularly town centres, and state that they would be prepared to accept lower levels of provision. However, these authorities then require commuted payments to be made to compensate for the failure of developers to provide parking at the maximum level. Despite the use of the term maximum and the expressed desire to reduce car use or encourage a change of the modal split away from the private car, there remains a tendency to view the standards not as maximum permitted levels of parking but as absolute requirements. Equally, the interpretation of PPG13 by many authorities leads to reduced maxima for sites accessible by public transport and hence higher maxima for more peripheral sites, making them more attractive to developers. If the sequential approach is applied strictly in terms of assessing suitable locations, then this may not be a problem. However, if it is not, then out-of-centre sites will gain a competitive edge. (Draft revised PPG13 refers to this point.)

_C52. Parking policy needs to be clarified in development plans. Clearly, this is an issue beyond the confines of leisure but it is particularly pertinent to some of the large out-of-centre leisure parks and facilities, including a number of the case studies._

**R56. National parking policy ie maxima or reduced requirements for parking in accessible locations (cf PPG13) needs to be applied correctly and consistently by all LPAs to leisure developments.**

12.130 Few of the plans mention the needs of households without cars for leisure facilities accessible by different means of transport.

**Issue 47: Should leisure land-uses be subject to explicit policies to tackle social exclusion?**

12.131 Social exclusion from leisure has not arisen as an issue explicitly in the course of the research but is of increasing concern in Government policy.

**R57. Development plans need to consider social inclusion specifically in the context of planning for leisure.**
Leisure and development control

12.132 Again, relatively little background research has been undertaken by LPAs in respect of applications for leisure development cf the Barking and Dagenham, Bristol and Kettering case studies. Pro-active responses such as at Norwich are infrequent.

Issue 48: What should LPAs seek to obtain from applicants by way of background evidence to support leisure planning applications?

12.133 Few applicants submit background studies eg market demand/needs and/or a review of alternative sites in relation to major leisure projects. The corollary is that LPAs have not been requiring them to be submitted.

12.134 One of the problems is that there is no established format for leisure impact studies and there has been some scepticism about the efficacy of the few needs analyses that have been undertaken cf Wakefield and Bicester case studies. Even in Norwich, the different competing applicants for multiplex development in the town centre came up with different assessments of the market.

12.135 It has been recommended above that research is undertaken to establish an agreed methodology by which potential demand could be estimated for a particular leisure activity at a particular location. This would provide LPAs with a basis, in line with PPG6, to estimate capacity, and thus to apply the sequential test and to estimate the threat to town centre vitality and viability in a more informed way.

12.136 TIAs are the only reports to be submitted with any regularity in leisure planning applications. Again, as reported above, they have tended to focus on highway capacity and safety issues with little attention given to the central transportation issues in PPG6 and PPG13. Given that traffic and access were the key issues reported by LPAs in their consideration of leisure applications, this is a significant shortcoming. There is clearly potential to address this problem through the proposed Transport Assessments referred to in the draft revision of PPG13 (see Endnote 81). (See recommendations for PPG6 above.)

12.137 Similarly, there have been few, if any, practical assessments of the impact of proposals on the vitality and viability of town centres in relation to planning applications. Most assessments of vitality and viability have been subjective, undertaken by applicants to support proposals by demonstrating the capacity for additional facilities without impacting upon existing town centre facilities. However, as described above, the vitality and viability of town centres is far more fine-grained than such capacity studies imply; it is not just the potential closure of an existing facility that is at stake. This is referred to in PPG6 (para 4.3-4.4).

12.138 It has been recommended above that research is undertaken to develop a common methodology to measuring the impact of leisure development on the vitality and viability of town centres. This will require information on user profiles and leisure patterns, local needs and markets, the towns competitive position etc. It has been suggested above that this is an important role for town centre planners and/or managers.

C53. There is no common approach to submitting the appropriate, necessary evidence to
support major leisure planning applications. This is largely to do with the absence of commonly accepted terms of reference and methodologies for Leisure Impact Assessments.

R58. In situations where leisure applications do not directly accord with the development plan, it is recommended that LPAs prepare, or require, an appropriate Leisure Impact Assessment to include an assessment of capacity, transport and environmental impact (including vitality and viability of the town centre).

**Issue 49: Are planning decisions consistent and comprehensive in their consideration of planning policy guidance? What are the main areas of inconsistency that need clarification? (And, as referred to above, what weight should be given to the benefits for economic development, and to the vitality and viability of town centres, resulting from different forms of leisure development.)**

12.139 PPG6 and 13 issues were given importance in LPA decisions and appeal cases reviewed but a number of inconsistencies are apparent. On the basis of the reasons for refusal, issues such as vitality and viability and the sequential approach appear to have been given greater consideration by Inspectors than by LPAs; and economic development, less so. However, there still appears to be variations in interpretation and inconsistent application of PPGs 6 and 13 in appeal decisions.

12.140 The sample of major leisure applications does suggest that the leisure industry is still attracted to town centre and edge-of-centre sites and LPAs appear to be encouraging such development, in general, by the higher refusal rate for out-of-centre applications. However, there appears to be a propensity to approve out-of-centre mixed leisure developments and leisure/sports centres and pools.

12.141 In general, the planning issues raised in out-of-centre mixed leisure developments have been:

- the apparent reluctance (or misunderstanding of the requirement) to enforce disaggregation of uses; and
- the perceived need for a major development to meet economic development objectives.

12.142 The planning issues in relation to leisure/sports centres and pools are related to the fact that these are traditional public sector land-uses, development is very often land ownership driven and there has been an implicit understanding that such uses are not subject to PPG6. It has been argued in some cases that such uses fall under PPG17 and are therefore not bound by PPG6 principles.

12.143 The potential negative effects of out-of-centre developments on the vitality and viability of centres has received relatively little attention in the sample of applications and certain categories of appeal. Where it has been mentioned, the decisions appear to have been subjective rather than based upon explicit analysis.

12.144 Regeneration is a significant issue with a number of LPAs. In a number of cases, it was
considered to outweigh PPG6 considerations but regeneration appears to have held less sway at appeal.

**12.145** Very few pub and restaurant proposals (including drive-throughs) have been subject to PPG6 and the sequential approach.

_C54. Overall there appears to be a lack of clarity and partial coverage of issues amongst LPAs and Inspectors leading to some inconsistency. The main areas of inconsistency are those defined in para 12.6._

### A3 development

**12.146** PPG6 stresses the advantages of a diversity of uses that can contribute to vitality and viability and advises that LPAs should encourage diversification in the town centre as a whole (2.12). In addition, PPG1 and PPG6 encourage the promotion and retention of mixed-use developments in town centres. LPAs deal with a large number of applications for A3 development either on their own or in combination with D2 uses. Many urban LPAs are experiencing amenity problems with A3 development and the evening economy within town centres eg Ealing. LPAs are probably experiencing more problems with A3 development than with the relatively smaller numbers of major leisure developments.

**Issue 50: How should the identified problems of planning for A3 uses be addressed given the need to balance the development of the evening economy with amenity and other town centre uses?**

**12.147** Planning powers can be used to control hours of operation and noise levels generated by the use itself. They cannot easily be used to control activities outside the curtilage. The inevitable consequence of pub and night-club development is late night revelry, or worse, in public places. Residential amenity can be seriously affected. In addition, not all leisure activities are compatible one with another in the same immediate area. In particular, noisy and/or late night activities may put off users of other leisure facilities. There is the possibility that leisure development can reduce town centre diversity if it results in a youth mono-culture that discourages other people cf Ealing case study. A balance is needed between vitality and amenity; a balance that needs to be weighed up locally on a continuous basis. “The young have rights too!” (see Endnote 82)

**12.148** In other areas, urban LPAs can experience difficulties in promoting A3/D2 development eg with licensing regimes when seeking to develop the evening economy within town centres eg Sheffield.

**Issue 51: Is the approach of combining planning and management an effective response to the problem? Should planners become involved in wider management issues? Can a management/partnership type of approach to A3 development issues be sustained?**

**12.149** The two case studies in Ealing and Sheffield suggest that a fine-grained, multi-disciplinary approach is needed to control, promote and manage small-scale leisure developments such as A3 and night-club uses ie balancing vitality, amenity and diversity
through development planning and area management. This approach involves:

- producing clear, justified policies for places for eating, drinking and entertainment, adapted to local conditions in Supplementary Planning Guidance and/or integrated into the UDP. Statutory and non-statutory policies must be closely co-ordinated and mutually reinforcing;

- integrating transport and leisure land-use planning to maximise the opportunities for alternative means of transport, notably late at night;

- using zoning as a means of development control - and promotion of A3/D2 land-uses ie public sector support to confine or promote the evening economy in appropriate new areas or leisure quarters where there is more flexibility for A3/D2 uses, away from sensitive residential areas and in locations accessible by a range of transport;

- developing positive local management initiatives to help both:

  - mitigate some of the existing problems of cumulative, late night activity cf the Responsible Host programme in Ealing; and

  - encourage new development where appropriate cf the Cultural Industries Quarter in Sheffield (CIQ);

- co-ordinating such actions in partnership with the licensing authorities (in particular), police, local community, private sector and planners. The Ealing working group has achieved much in a short time through co-ordination of the main parties (and committed individuals). The involvement of the magistrates in the working group and the role of the planners at the magistrate's court has been crucial to its success. In contrast, in Sheffield, the lack of co-ordination has meant that licensing decisions appear to have been contrary to planning and economic development objectives for the CIQ.

12.150 Planners are in the best position to take on this co-ordinating role because:

- the issues are to do with planning in its broadest sense, from control of individual development to the realisation of a wider vision for an area;

- it is a multi-functional role for which planners are well equipped; and

- it is a long-term process.

C55. Pro-active partnerships and area management have been key to the success of the initiatives in the CIQ in Sheffield and in Ealing helping to meet clearly defined objectives (in the UDP and/or non-statutory proposals) in broad planning terms. Planning is central to these partnerships and area champions have a vital role to play in achieving those objectives. In Ealing and Sheffield, these roles have been combined most successfully.

C56. This type of approach represents an extreme, but justified, example of pro-active planning as already proposed in PPG6. It is complex and time/resources consuming and needs to be sustained, but such an approach is needed to resolve equally complex planning
Leisure is unusual in that many activities require one or more licences as well as planning permission.

**Issue 52: How can planning and licensing work together most effectively to help control and manage the problems associated with A3 development?**

**12.152** All the different types of permission need to be considered together in order to make the most of leisure's positive effects and to avoid related problems. (Although a much wider issue, the proposal to rationalise licensing under one authority would appear to contribute significantly to the aim of simplifying procedures for applications and objections.)

**12.153** Notwithstanding such changes, important issues remain in the relationship of planning permission and licensing. In theory, planners should assess need and licensing authorities should address management issues. However, when planning consent is not required for a change within the A3 use class, the licensing authority is the sole means of control. This highlights:

- the issue of the efficacy of the current UCO (see above, para 12.64);
- the fact that an award of costs against licensing objectors is a real deterrent to the active participation of residents, the Police and local authority. This is clearly inconsistent with the planning system; and
- the importance of the very positive action taken recently in Ealing to impose detailed operational conditions on the grant of a licence that has acted as a very effective and flexible means of control which can be used in conjunction with traditional development control measures;

**C57.** Co-ordination, simplification and clarification of licensing procedures (application and objection) would appear to be a priority. Co-operation between planning and licensing authorities is crucial for the effective planning and management of A3/D2 land-uses.

**C58.** Under the current UCO, licensing conditions have a very important role to play in helping to control the negative effects of A3 development.

**R59.** It is recommended that LPAs consider marshalling their relevant local planning policies for such A3/D2 uses, along with any broader vision for leisure in the local area, within dedicated Supplementary Planning Guidance eg under the heading Places for Eating, Drinking and Entertainment.

**R60.** It is recommended that LPAs take a pro-active lead and co-ordinate relevant partnerships to consider the future management and development control of A3/D2 issues. This should apply equally to areas seeking to restrain and those seeking to promote A3 development.

**R61.** These wider initiatives might best be developed and presented in the
Tourism and development plans

12.154 Tourism does feature more prominently in development plans than (commercial) leisure.

Issue 53: Is tourism given sufficient weight and depth in development plans? Should tourism policy emphasis in development plans be changed to explicitly reflect the principles of sustainable development inherent in PPGs6 and 13?

12.155 A majority of LPAs has general locational strategies for tourism uses, encouraging tourism uses in urban areas and discouraging it in open countryside or designated areas.

12.156 The purpose of most tourism policies is to protect environmental areas rather than the broader principles of sustainable development inherent in PPG6 or PPG13. In particular:

- few LPAs refer to the sequential test specifically in their development plans and for those that do, there is some uncertainty about the uses to which it should be applied; and
- few LPAs have parking standards expressed as maxima;

However,

- most LPAs have policies relating to hotels but few relate them to PPG6 issues;
- most rural LPAs have policies relating to caravans but they are often restrictive;
- most LPAs have policies relating to attractions, encouraging them in urban areas;
- many LPAs have allocated sites for tourism use, notably hotels and some caravan sites and a significant proportion have facilitated the assembly of sites for tourism uses; and
- a majority of LPAs has prepared tourism strategies but many are marketing oriented.

C59. Tourism is given significant weight in many development plans but although many plans express a preference for locating travel intensive uses in town centre sites or sites accessible by non-car modes of transport, relatively few plans state explicitly that the principles of the sequential approach apply to tourism uses.

R62. As they review their development plans, LPAs need to reflect the underlying principles of any revised PPG21, PPG13 and PPG6. These will include the sequential test, vitality and viability, traffic impact, public transport accessibility where appropriate as well as the relevant policies of restricting development in the countryside. The relevance of such policies to each different tourism land-use should be made explicit eg:
• major hotels and footloose attractions directed to urban centres;
• attractions with large site requirements directed to sites well served, or potentially well served, by public transport; and
  • small hotels, attractions and caravan sites are generally not footloose and need to be considered in the context of additional criteria.

R63. As with leisure, the relationship of maxima or reduced requirements for parking in accessible locations and minimum standards on less accessible locations needs to be addressed in the development plan.

Issue 54: Should planners be more pro-active in tourism terms, identifying need and sites and working more closely with the industry? What are the potential benefits for an LPA in taking on a significant commitment to undertake background research into tourism? How can LPAs be encouraged to take such action?

12.157 Like PPG6 for leisure, PPG21 also advises LPAs to undertake background work necessary to identify future trends in tourism and their implications. Although such work is increasingly apparent, few LPAs are doing this in the plan-making process. It is still rare even amongst those authorities facing development pressure for tourism uses. Like leisure, tourism is a rapidly changing industry and it is particularly important that studies are reviewed and updated frequently.

12.158 Tourism impacts as described in this report are highly complex and therefore require an appropriate planning response. Clearly, there are resource implications. Considerable effort has to be expended by planning officers on wider visitor management initiatives involving a range of different interests as well as formal development planning and control. Given the nature of tourism and the external drivers of growth, this is the most effective way to manage tourism development.

C60. There is a need for planners to broaden their approach in a pro-active way as the only effective means of tourism planning.

R64. To undertake more effective planning for tourism at the local level, LPAs will need to have access to a stronger information base from background studies and monitoring. This might be done in the context of a tourism/visitor management strategy (that could then be given appropriate status in planning terms (see Endnote 83)). This information will facilitate the LPA in analysing needs and identifying sites for tourism, which should be reflected in the policies and proposals of the development plan.

Issue 55: How can LPAs assess and balance social and economic benefits with the need to protect the countryside, particularly in sensitive and designated areas? Are development plans too restrictive in relation to the development of small-scale tourism development in the countryside eg conversion of redundant buildings for tourist accommodation?
12.159 Chapter 11 outlines the particular contribution that tourism can make to rural regeneration. This issue of balance is one of increasing importance. The evidence of this research (cf the North West Regional case study and covered more fully under regional planning below) suggests that there is a danger of standard negative policies for tourism development in the countryside which are not necessarily based on a thorough analysis of the scale and nature of the perceived problems. As referred to elsewhere in this report, tourism impacts are complex with new tourism land-use development contributing only a small part to the overall problem.

C61. There is a need for more detailed research on the nature and scale of tourism impacts. Policy formulation should be based on appropriate capacity studies, probably at a (sub)regional level. (See below)

R65. There is a need for LPAs, in partnership with the industry and local communities, RTBs and RPBs to assess systematically the impact of tourism in their (sub)region (particularly in countryside and designated areas), review potential capacity for different types of tourism development and develop policy appropriate to the local area(s). (See recommendations on regional planning).

12.160 Hotels are the most likely tourism land-use to be subject to specific policy. While most rural authorities have policies relating to caravan, camp and chalet sites (and many have policies restricting such uses in designated areas) there is some evidence that few LPAs have policies reflecting the recommendations in PPG21, Annex B encouraging the improvement of existing sites. Many plans, particularly in traditional tourist areas, contain policies encouraging new or extended tourism attractions.

Issue 56: How should LPAs reflect the different requirements of the main individual tourism land-uses; hotels, caravans and attractions?

12.161 PPG21 offers advice on planning for hotels, caravans and attractions. This advice and possible changes have been considered earlier in the report.

Issue 57: Do the unspecified land-use site allocations in development plans (eg offices or hotel) meet the needs of tourism land-uses?

12.162 Although two thirds of LPAs allocated sites comprising or including tourism uses, these are often for unspecified tourist uses or mixed-use sites. As with leisure, the tourism sector often can not compete for town centre sites against other commercial uses eg a site for office or hotel use is often an inadequate allocation if a tourism use is needed specifically, as such uses can rarely compete with other commercial uses. If tourism uses are to be incorporated in mixed-use sites, this needs to be specified in associated development briefs.

R66. In the light of PPG6, PPG13 and needs/capacity assessments, available, suitable and viable sites need to be allocated for proposed tourism developments with relevant criteria made explicit.

Issue 58: Should LPAs give greater importance to tourism strategies which incorporate wider visitor management issues that seek to ameliorate associated tourism/planning
Tourism strategies are prepared by 60% of LPAs that responded to the survey, but many are marketing oriented. Development plans are the appropriate vehicle for tourism development control policy but good visitor management plans including relevant planning policies can, in many cases, be even more helpful in dealing with the impacts of tourism development and encouraging sustainable tourism development (see Endnote 84). These usually involve cross-cutting issues:

- traffic management;
- promotional strategies to avoid peak periods and pressure sites;
- information about alternative sites;
- interpretation that helps visitors understand and appreciate environmental pressures;
- protective measures for key sites;
- wardening and guiding; and
- involving the local community.

Similarly, tourism strategies can focus on enhancing value from tourism without associated growth in visitor numbers or physical development.

Local authorities are initiators of a large proportion of attractions and promote the industry extensively in other ways, particularly in promoting access to the countryside. These wider roles need to be considered alongside development plans in the overall management of tourism by the local authority.

The fragmented nature of tourism has led to a fragmented policy response in statutory plans and other documents. In some major destinations, like Cambridge, the different parties involved in tourism have been successfully drawn together to provide an effective forum for the consideration of planning issues.

Visitor management plans, including relevant planning policies, can be very effective in controlling the impacts of tourism development and encouraging sustainable tourism development. Their preparation involves a range of interested parties. Consistency in policy at all spatial levels is imperative.

Local authorities should take a pro-active role, working with RTBs, to facilitate and co-ordinate local partnerships/forums for the development and management of tourism.

There is a need to co-ordinate and integrate policies in development plans with (and between) RPG and other relevant, non-statutory strategies, notably visitor management and tourism strategies.
Issue 59: Should LPAs seek to protect tourism uses in areas of decline or rapid market change eg some resorts?

12.167 This issue has not been considered in the context of this research.

Tourism and development control

12.168 Again, relatively little background research has been undertaken by LPAs in respect of applications for tourism development and LPAs do little research into the effects of tourism uses.

Issue 60: What should LPAs seek by way of background evidence to support tourism planning applications?

12.169 Few applicants submit background studies eg market demand/needs or other relevant studies. The corollary is that LPAs have not been requiring them to be submitted. As with leisure, there is no established format for tourism impact studies.

12.170 Given the relatively small number of major applications and the special circumstances that often surround non-footloose facilities, it would not be appropriate to establish formal methodologies for tourism impact assessments. However, proposals in rural areas should be accompanied by supporting evidence to justify development including transport assessments and analyses of the impact of proposals on the vitality and viability of town centres where appropriate.

C63. There is no common approach to submitting the evidence to support major tourism planning applications.

12.171 The most frequently mentioned issue (by LPAs and in the review of appeals) relating to major developments was the effect on open countryside and designated areas in particular.

Issue 61: How successful are policies in controlling and directing developments to acceptable locations? Is there some uncertainty about the relevance of PPG13 and PPG6 issues to tourism uses?

12.172 Policies in open countryside and designated areas may be restrictive in accordance with PPG21 and may be major issues in the consideration of applications, but major tourism developments are refused permission in such areas only marginally more frequently than in other areas. This suggests the policy is either deterring unrealistic applications or that the policy is being applied flexibly.

12.173 Highways and traffic were considered by LPAs to be major issues but issues relating to the location of developments, their accessibility by public transport, their impact on town centres and other considerations in PPG6 and PPG13 were raised as issues less frequently. It would appear that few LPAs are giving great weight to the principles of sustainable development in relation to tourist developments, notably issues in relation to out-of-centre developments and developments in the open countryside. However, the approval rate for major footloose tourism developments such as hotels, attractions and museums was higher for
town centre and edge-of-centre sites than for out-of-centre or open countryside locations.

**Issue 62: Are LPAs giving extra weight to the economic benefits of tourism development even within sensitive areas?**

12.174 As with leisure, LPAs consider economic development is an important issue in tourism development, even within sensitive areas. The economic benefits of tourism developments were cited as main issues in relation to 30% of the examples.

**Issue 63: Are planning decisions consistent and comprehensive? What are the main areas of inconsistency that need clarification?**

12.175 The review of appeals shows perhaps a greater awareness of the relevance of PPG21 and PPG13 (and PPG6) issues to tourism uses than displayed by LPAs. However, the appeal decisions reviewed indicate a significant degree of flexibility and/or ambiguity in interpretation, particularly in relation to trip generation and tourism need. Policy guidance is needed to give a clearer indication of the relevance and intentions of PPG21, 13 and 6 to tourism land-uses.

R69. It is recommended that applications for new attractions and large hotels be considered in the context of PPG6 and PPG13. In particular:

- location and subsequent assessment of need/capacity if appropriate;
- trip generation, accessibility by all means of transport and parking;
- impact upon the town centre; and
  - economic development.

R70. In situations where tourism applications do not directly accord with the development plan, it is recommended that LPAs prepare, or require, an appropriate assessment of need and impact including an assessment of trip generation, accessibility by different modes and any impact on the vitality and viability of the town centre.

**Recommendations for the Private Sector**

**The leisure industry**

12.176 There was much criticism of LPAs by the private sector, principally about their lack of knowledge of the leisure industry and the low status accorded to such developments. However, the private sector acknowledged that they too offered little to the plan making process. If the planning process is to gain full support, it is important that the private sector become involved in a pro-active way.

**Issue 64: What role should the private sector play in the formulation of leisure planning**
12.177 The private sector has a particular contribution to make in terms of:

- participation in, and contribution towards, further research at national level, including the provision of the (often better) information available to the private sector;
- participation in local plan making and visitor/town centre management through local partnerships; and
- raising awareness of sustainable development issues within the industry.

12.178 Recognised trade organisations such as the Cinema Exhibitors Association and others have a potentially very important role to play in respect of plan making, further research and dissemination of information within the sector.

R71. The private sector should recognise that for its concerns to be met and policy to be improved, it should be actively involved in:

- the formulation of Regional Planning Guidance for leisure, notably in the preparation of (sub)regional capacity studies;
- the preparation of development plans, particularly the identification of leisure development sites; and
  - the preparation and implementation of management plans for town centres - with particular reference to the problems associated with A3/D2 uses.

R72. The private sector should be encouraged to assist with subsequent research on:

- the appropriate techniques for assessing capacity for leisure facilities; and
  - the appropriate technique for measuring the contribution of leisure to the vitality and viability of town centres.

R73. The private sector should be encouraged to disseminate information and advice on good practice on sustainable development issues within the leisure industry.

The tourism industry

12.179 As in the leisure industry, the private sector needs to engage more closely in the planning process. The tourism industry has the advantage of a more formal structure with local tourism associations and the RTBs. Unfortunately, "too few choose to take an active part in local Tourism Forums" (see Endnote 85). The success of tourism fora in places like Cambridge
suggests that this mechanism should be formalised for wider use.

**Issue 65: What role should the private sector play in the formulation of tourism planning policy and development plans?**

12.180 As in the leisure sector, the tourism private sector has a particular contribution to make in terms of:

- participation in further research at national, regional and local levels;
- participation in plan making and visitor management in towns and rural areas through local partnerships; and
- raising awareness of sustainable development issues within the industry.

12.181 Recognised trade organisations such as BHA, BH&HPA and the Regional Tourist Boards (as public-private sector bodies) etc have a potentially very important role to play in respect of plan making, further research and dissemination of information within the sector.

R74. The private sector should recognise that for its concerns to be met and policy to be improved, it should be actively involved in:

- the formulation of RPG for tourism, notably in the preparation of (sub)regional capacity studies (working with the RTBs);
- the preparation of development plans, particularly the identification of hotel and other sites eg the Prime Site policy in the Great Yarmouth case study; and
  - the preparation and implementation of visitor management plans for areas under pressure including town centres and rural honeypot sites.

R75. The private sector should be encouraged to:

- assist with subsequent research on the appropriate techniques for assessing capacity in tourism sub-regions; and
  - disseminate information and advice on good practice on sustainable development issues within the tourism industry.

**Endnotes**

53 This research has not investigated the issue of delay .
55 Ministerial answer to a Parliamentary Question, 11 February 1999.
At appeal, the concept of need has been considered to include employment creation, redevelopment of a brownfield site, improvements to public transport accessibility as well as benefits to the community. Referred to by Holt in 'Rationalising need as a material consideration' in Planning, 20 October 2000.

Dodona, the cinema consultants, point out that cinema impact analysis is in its infancy and, at best, rests on a series of rules of thumb about admissions per capita, per annum which are not properly tested. Demand can be defined in various ways eg from the operators’ point of view emphasising profit; from the consumers’ emphasising convenient access; and from the local authority's, emphasising public good and opportunity costs.

This point relates to the suggestion that planning policy should include economic development as a key principle, along with assessments of capacity, accessibility, town centre vitality and viability and trip generation.

EIA-requirements establish higher criteria thresholds (0.5ha-10,000m²).

A corollary of making town centres (like Ealing) highly accessible by public transport is that it inevitably encourages user groups that rely upon such modes, particularly the young. Such problems have not developed at less accessible locations in the Borough. The town centre is a victim of its own success in PPG6 terms of accessibility and vitality of the town centre.

Vital and viable town centres, op cit.

The lack of clarity in definitions and application of approach was noted recently in the National Retail Planning Forum (2000) 'The Sequential Approach to Retail Development'. (in Planning 3 March 2000 p3).


The leisure centre of a town may be different to the retail centre eg Sheffield and Norwich exhibit the trend for different quarters or different functional centres.

See Trip Rate Information Computer Systems (TRICS) data.


Tomorrow's Tourism, op cit


Annex A of PPG13 also refers to planning for roadside facilities.

UK Day Visitor Survey, op cit.

Sightseeing, op cit.

The Tourism Company estimate.

The Tourism Company estimate.

Sustainable rural tourism; opportunities for local action, DNH/ RDC/ ETB /CoCo. 1995.

As recommended in Tourism and the Environment, op cit.

This research was finalised before publication of PPG11 (Regional Planning) in October 2000.

Tomorrow's Tourism, op cit.

Similar recommendations included in Tourism and the Environment, op cit.


Draft Revision of PPG13 op cit refers to Traffic Assessments for leisure schemes in excess of 1,000m² or 1,500 seats for stadia.

Quote from one consultee in Ealing case study.

The Government “want all local authorities to have in place a strategy for their tourism and leisure activities. Good strategies need to be built and evaluated on relevant and reliable statistics, collected cost-effectively”. Janet Anderson MP, Foreword to Measuring the Local Impact of Tourism, DCMS, 1998.
84 As recommended in Tomorrow's Tourism and the Impact of Tourism on Rural Settlements, op cit.
85 Planning for Tourism, op cit.
Appendix I: Extract From Research Project Specification Showing Objectives And Issues

Introduction

A1.1 Leisure activities have major land-use and transport implications. Leisure development is a major pressure for land-use change and leisure is the fastest growing purpose for travel. It is a function of the planning system to ensure that adequate land resources are allocated to allow as full as possible a range of these activities to take place. It must also ensure that they are located in accordance with the principles of sustainable development.

A1.2 Leisure includes tourism, and vice versa: the boundary cannot be mapped out precisely. There are also overlaps with other sectors, such as sport and recreation, entertainment and retail development. This situation is apparent in existing planning policy guidance. There is no one PPG covering leisure, but aspects are dealt with across a range of PPGs:

- PPG6 encourages development in existing centres;
- PPG12 identifies tourism and leisure as topics for inclusion in development plans;
- PPG13 sets out general locational principles, encouraging integration of land-use and transport policies;
- PPG17 advises on recreational facilities which may equally perform broader leisure and tourist functions; and
- PPG7 (Countryside) and PPG15 (Historic Environment) are also relevant.

A1.3 By understanding development trends and pressures in the leisure and tourism industries, and by examining these alongside the objectives of the planning system, the Government hopes to understand better the tensions between the two. This will allow it further to refine planning policy. The Department of the Environment, Transport and the Regions therefore wishes to commission a two-stage research project into how planning policy guidance for England could best facilitate leisure and tourism developments whilst achieving more sustainable patterns of development and travel.

A1.4 The research will comprise two distinct stages, the first dealing with leisure, and the second dealing with tourism. It is intended that the two stages will be sequential, and whilst contractors are invited to tender for both stages of the contract, the awarding of the second stage of the contract will be carried out separately and will be dependent on a satisfactory outcome from Stage I. It is anticipated that some of the findings from the first stage will have relevance to, and will feed into, the second stage of the research project.

Stage I - Planning For Leisure Developments
Objectives

A1.5 The objectives of the research are:

- to identify current trends in leisure developments;
- to consider the range of locational and other land-use and transport requirements of the (English) leisure industry;
- to ascertain how effectively the planning system is dealing with these at present, including the contribution of planning policy guidance; and
- to recommend how planning guidance could be developed or revised, including consideration of the need for a free-standing PPG, to ensure provision for leisure development which takes full account of sustainable development principles.

Issues

A1.6 The scope of the first stage of the research project is defined by the issues it should address. These include:

- identifying the range of leisure activities and, in particular, those which:
  - are growing;
  - the industry is currently seeking to promote;
  - are innovative; and
    - have a significant impact on the environment.

- the aspirations and needs of leisure developers:
  - whether these are currently being met by provision in local development plans and planning decisions;
  - the extent to which leisure developers engage in the plan preparation process; and
    - whether there are any significant gaps, overlaps or inconsistencies in the coverage of leisure issues in planning policy guidance;

- assessing how leisure issues are covered in development plans; the extent to which local authorities planning policies and decisions on leisure development reflect the Government's commitment to sustainable development;

- assessing the positive and negative impacts of new leisure proposals on:
  - certain social groups;
  - the vitality and viability of town centres;
  - on urban regeneration;
on infrastructure; and
on urban form.

- identifying the overlap between leisure and tourism, and in particular those issues which the second stage of the project will need to examine.

A1.7 The research must take into account and reflect a full understanding of the implications and effects of:

- the principles of sustainable development;
- published Government policy;
- the significant growth in many sectors of leisure;
- the likely future pattern of new and emerging forms of leisure development;
- any impact from Lottery funding; and
- emerging findings from other research being undertaken for the Department.

Stage II - Planning For Tourism

Objectives
A1.8 The objectives of the second stage of the research are:

- to identify the current trends in tourism developments;
- to consider the locational and other land-use and transport requirements of the (English) tourism industry;
- to ascertain how effectively the planning system is dealing with these at present, including the contribution of planning policy guidance; and
- to recommend how planning guidance could be developed or other changes made to ensure provision is made for tourism development which takes full account of sustainable development principles, including travel and transport considerations.

Issues
A1.9 The scope of the second stage of the research project is defined by the issues it should
address. These include:

- issues identified in the first stage of the study as being of particular reference to tourism development;
- identifying any significant gaps, overlaps or inconsistencies in the coverage of tourism issues in planning policy guidance;
- assessing how tourism issues are dealt with in development plans; examining the extent to which tourism developers become involved in the plan preparation process; identifying the recurring and emerging issues that tourism developments raise for local planning authorities and their communities; judging how well these are resolved through the development control process. These issues include:
  - the extent to which policies and decisions of local planning authorities reflect the Governments commitment to sustainable development;
  - specifically, how the planning system does and should respond to tourist attractions whose locations encourage unsustainable travel patterns; and how it should treat proposals to improve the quality of existing tourism facilities;
  - how planning guidance can adequately address the issues raised by urban tourism, including overtly commercial tourism, factory shopping and tourism shopping;
  - how the planning system can recognise and help to promote the role of tourism in urban and rural regeneration; and whether planning authorities should be more pro-active in their approach to tourism; and
  - whether it is practical and appropriate for the development plan process to attempt to plan more effectively for large-scale tourist development.

A1.10 The research must take into account and reflect a full understanding of the implications and effects of:

- the principles of sustainable development;
- published Government policy;
- areas of growth, and those in need of regeneration;
- the future pattern of new and emerging forms of tourist development;
- the effects of Lottery funding; and
- emerging findings from other research being undertaken for the Department.
Appendix II: Definition And Classification Of Leisure And Tourism Land Uses

Introduction

A2.1 This appendix considers the broad definitions of leisure, recreation and tourism and suggests relevant distinctions in planning terms. It then develops a means of classifying leisure land-uses using a range of factors; leisure or tourism, the Use Classes Order, indoor or outdoor, usual location and site constraints. Finally, it identifies the range of leisure land-uses that are the subject of this research.

Some definitions

A2.2 In theoretical terms, leisure is generally considered to be the time period when an individual has the freedom to choose what to do beyond any formal employment and the domestic requirements of life. Recreation is considered to be the group of activities that individuals carry out in their leisure time including sport, commercial leisure, passive activities such as reading and watching TV and the traditional tourism activities of taking holidays away from home and day visits to attractions.

A2.3 In common parlance, leisure and recreation are often treated synonymously with a general presumption that recreation covers outdoor activity and formal sporting participation while leisure covers entertainment (in and out of home) including most attractions and informal sporting activity. Tourism is generally perceived, quite separately, as holidays involving a stay away from home. Cultural and catering facilities are perceived to fall between these stools (Fig A2.1).

A2.4 In the context of this research project, it is important to consider leisure/recreation and tourism as two separate industries while appreciating the significant theoretical and practical inter-relationships. The most important distinction is between regularity of use. Leisure and recreation facilities are used on a regular, sometimes spontaneous, basis from home, as part of an individuals normal leisure time while tourism facilities are used on special, generally planned, non routine or longer trips including, but not limited to, overnight trips (see endnote 1). Although many so-defined leisure facilities would be used by tourists, and vice-versa, the criteria reflect the main market, local users or visitors.

Figure A2.1: The relationship between leisure and tourism - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

Leisure activity classification

A2.5 Torkildsen provides a useful general classification of leisure activity (see endnote 2). This primary classification has been modified and rationalised for the purposes of this research in Table A2.1 in order:

- to make no distinction between public and commercial providers; it is now becoming increasingly blurred. In land-use planning terms, it is irrelevant;
• to exclude home leisure; in planning terms, this is irrelevant;
• to exclude education related recreation eg adult education centres and libraries where the activities are primarily educational or, in the case of libraries, servicing home-based leisure much like a shop;
• to exclude retail leisure such as betting offices (and others not referred to by Torkildsen ie video hire, speciality retailing including factory outlets, craft centres, markets, boot fairs). Such activities are predominantly retail; and
• to include missing activities eg motor sport, air sports, fishing lakes etc.

Table A2.1: A classification of leisure and tourism activities - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

A2.6 Clearly, there is considerable overlap between these activities and facilities. From this broad range, it is necessary to distil and classify individual land - uses for planning purposes. This can be done in different ways ie by considering:

• whether the activity is leisure or tourism;
• the current use class; and,
• basic physical planning factors ie:
  o indoor or outdoor;
  o usual location (town centre, other urban or rural); and
  o site constraints (scale, noise, safety or fixed site).

Leisure and tourism
A2.7 On the basis of the definitions referred to in A2.2 to A2.4 above, leisure includes:

• commercial leisure such as; cinema, bowling, night-clubs etc;
• (built) sports facilities (commercial and non-commercial) such as stadia, leisure centres;
• cultural facilities; and
• outdoor activities:

    and tourism includes:

• visitor attractions (commercial and non-commercial); zoos, theme parks, museums,
galleries, visitor centres, heritage sites and monuments, gardens, natural features etc;

- accommodation; hotels, holiday villages, caravan/camping sites; and
- conference and exhibition centres.

**Use classes**

**A2.8** The Town and Country Planning (Use Classes) Order, 1987 classifies leisure and tourism as follows:

- Class A3 Food and drink; Use for the sale of food or drink for consumption on the premises or of hot food for consumption off the premises eg restaurants, cafes, pubs, bars and take-away;
- Class C1 Hotels; Use as a hotel, boarding or guest house where, in each case, no significant element of care is provided. Hostels are now excluded;
- Class D1 Non-residential institutions; any use not including a residential use (inter alia) - for the display of works of art (otherwise than for sale or hire), as a museum, as a public hall or exhibition hall;
- Class D2 Assembly and leisure; Use as; a cinema, a concert hall, a bingo hall or casino, a dance hall, a swimming bath, skating rink, gymnasium or area for other indoor or outdoor sports or recreations, not involving motorised vehicles or firearms (excludes theatre); and
- Sui generis; not included in the Use Classes Order.

**Indoor and outdoor**

**A2.9** Although this appears a straightforward means of classification, many external resources have ancillary indoor facilities eg country parks with visitor centres and, vice versa, indoor facilities have outdoor elements eg sports centres with playing fields. In the extreme case of stadia, it is argued that they are essentially indoor facilities. The main difficulty is with heritage sites that attract both internal and external visitors.

**Usual location**

**A2.10** Leisure and tourism land - uses can also be classified according to their usual location ie where such land - uses are commonly found rather than the preferred location in planning terms. In this context, it is helpful to distinguish between town centre (including edge-of-centre), other urban or urban fringe locations (whether within or outside local centres) and rural. Classification is based on traditional, or most common, locations eg night-clubs are usually located in town centres rather than out-of-centre locations.

**A2.11** Some land uses can be found commonly in more than one location type; this is often to
do with different scales of development eg bingo can be found in town centres, district centres and out-of-centre.

Site constraints

A2.12 Some leisure and tourism land - uses have site constraints that dictate a particular location, providing another form of classification. For example:

- the scale of land take required eg golf courses, indoor ski centres;
- noise and/or safety considerations eg motor sports, shooting; and
- fixed historic or natural sites eg beaches, lakes, heritage sites.

A2.13 Although the latter may not be footloose, a proposal to improve access to an historic site for example, through the creation of visitor facilities, is discretionary and thereby raises similar issues.

A2.14 Using the above criteria, leisure and tourism land - uses can be classified as shown in Table A2.2.

Table A2.2: All leisure and tourism land uses by category - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

Defining leisure and tourism land uses for the research

A2.15 Broadly, leisure and tourism activities fall into the following categories:

- outdoor recreation;
- indoor recreation;
- outdoor informal recreation;
- countryside recreation;
- cultural recreation;
- catering;
- attractions; and
- accommodation.

A2.16 From this categorisation, four groups of activities emerge from the inherent nature of the leisure land - uses:
- indoor and cultural recreation; a group of indoor, urban, footloose leisure land uses, generally D1 and D2 uses;
- catering; similar to indoor recreation but a segregated use class;
- visitor attractions and accommodation; a mixed group but all tourism related; and
- outdoor, rural/countryside and informal recreation; a group of leisure/recreation activities often with particular site constraints; playing fields, air and water sports, motorised and gun sports, golf etc. These are covered generally by PPG17 and subject to separate research.

A2.17 The focus of this research project is on the first three groups of activity described in A2.16 above and detailed in Table A2.3 below. These are the generally foot-loose, urban leisure facilities that can impact on town centre vitality, viability, accessibility and transportation issues (Stage One) plus the special case of tourism facilities (Stage Two).

Table A2.3: Leisure and tourism land uses for Stages 1 and 2 of the research - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

Endnotes
1. Tourism is defined by The Tourism Society as: "The temporary, short-term movement of people to destinations outside the places where they normally live and work, and activities during their stay at these destinations; it includes movement for all purposes, as well as day visits or excursions". Tourism, therefore, includes holiday (or leisure) tourism trips staying away from home overnight, overnight business tourism trips made during the course of work including attending conferences, meetings and exhibitions and non-routine day trips.
2. Leisure and Recreation Management, George Torkildsen, 1992
Appendix III: Policy And Legislation Review

Introduction

A3.1 This Appendix provides a review of the legislative and policy framework within which planning for leisure and tourism is undertaken, with summaries of the relevant primary and secondary legislation and national and regional policy guidance.

A3.2 Policy guides the planning authority and other decision-makers on how it should operate within the limits set by the law. Before reviewing the content of national and regional policy it is essential to highlight the main elements of the law which are of most relevance to the planning of leisure and tourism uses.

Legislation

The Town and Country Planning Act 1990

A3.3 The Town and Country Planning Act 1990 (as amended) provides the statutory basis for the current land use planning system in England and Wales. It establishes the development plan and the development control systems. The Act is supplemented by a number of other Acts, Regulations and Orders. The law defines development, sets out what is permitted development and, through the courts, indicates what is or what is not a material consideration.

A3.4 Section 54A, which was introduced in the Planning and Compensation Act 1991, was intended to give more emphasis to the plan in decisions in order to return to a plan-led system. It sets out the legal requirements for considering planning applications. The section states that "Where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise."

The Use Classes Order

A3.5 The Town and Country Planning (Use Classes) Order 1987 (UCO) sets out sixteen use classes that group together different uses. Changes of use between different uses within the same class do not require permission, unless there are conditions that restrict such changes. Section 55(2) of the 1990 Act expressly states that changes of use between uses within the same class are not development.

A3.6 Leisure and tourism uses, as defined for the purposes of this research, are contained within several different Classes of the UCO. Leisure uses are contained largely within Class D.2 (Assembly and Leisure) and Class A.3 (Food and Drink), although a number of leisure uses are found within D.1 and others are sui generis. Tourism uses are contained largely in Classes C.1 and D.1, although some D.2 and A.3 uses might be considered to be tourism uses. The individual uses within each Class were defined in Section 2.

A3.7 Several of the Classes contain a very wide range of uses that are very different in
character. For example D2 contains uses as different as a concert hall and a swimming bath. As aircraft are not vehicles, Class D2 also includes leisure flying uses. However, even though PPG17 refers to it as a leisure use and the Secretary of State (SoS) held that it was "a form of outdoor recreation analogous to a sport," (see endnote 3), war games are considered sui generis.

A3.8 The UCO was modified in 1987 as part of the Government’s policy of lifting the burden. The intention of the modification was to remove the need for planning permission from types of development that generally do not damage amenity, but retain control over changes of use that would have a material impact in planning terms on the local environment. It was intended also to allow more flexible use of premises and thus foster enterprise (see endnote 4).

A3.9 A change between two uses within the same class does not in itself normally require consent. It is important to note, however, that consent may be required if the change of use involves building operations that are subject to control, or if there is a condition restricting the use of the land or building to a particular use.

A3.10 Whilst the UCO specifies a number of uses which fall into each class and lists a number of uses which fall outside any class (sui generis uses), there are many leisure and tourism uses which are not referred to specifically. Theatres, amusement arcades or centres and funfairs are specifically identified by the UCO as sui generis, but it is often left to Inspectors, the SoS or the courts to decide whether a particular use falls within a class or whether a proposal involves a material change of use. This is decided on the facts of each case.

A3.11 There are many developments in the field of leisure which are not easy to classify as they involve a mixture of activities within the same planning unit or because the term used to describe them is imprecise. The latter problem of defining uses is exemplified by uses described as clubs, which may fall into Class D2 or A3, or may be a mixed use.

The Town and Country (General Permitted Development) Order 1995

A3.12 This order permits certain forms of operational development and certain changes of use between uses in different classes of the UCO. A number of parts of the order are of relevance to leisure and tourism uses. For example, Part 5 relates to caravan sites and Part 28 concerns development at amusement parks. The most significant class for the purposes of this research is Part 3 which permits certain changes of use. Changes of use from A3 to A1 and from A3 to A2 are permitted development.

Environmental Impact Assessment

A3.13 A number of leisure and tourism developments are included in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. Such developments must be screened by the local planning authority in order to determine whether or not the development would be likely to have significant effects on the environment - by virtue of factors such as their size or location - and hence require EIA. The leisure/tourism developments listed are: sports stadia, leisure centres, multiplex cinemas, ski-runs, ski-lifts, cable cars, golf courses, marinas, airfields, holiday villages and hotel complexes
outside urban areas, permanent camp sites and caravan sites, theme parks, and golf courses.

**Other statutory controls**

A3.14 A number of uses are subject to licensing controls. Dance/disco uses are subject to public entertainment licenses and uses involving the sale of alcohol are subject to liquor licensing. Other uses including casinos, zoos and caravan sites are subject to other forms of licensing control. The latter are subject to control under the Caravan Sites and Control of Development Act 1960. In addition, separate statutory responsibilities are exercised in the field of pollution ([see endnote 5](#)). The relationship with planning control is not always entirely clear and the courts have spent much time attempting to clarify the relationship between the different regimes.

**Review of Policy**

**National Guidance**

A3.15 The broad thrust of current Government policy relating to development in general is set out in various Planning Policy Guidance notes (PPGs). It continues to stress the important role of planning in assisting economic development and its role in influencing the design of the built environment and protecting amenities. Over the last seven years, however, the adoption of the principles of sustainable development and the Governments commitment to applying these to planning has had an increasingly important influence on the content of planning policy guidance. The principles of sustainability now lie at the heart of the PPG series.

A3.16 The Government White Paper *A better quality of life: A strategy for sustainable development for the UK* ([see endnote 6](#)), sets out the Governments strategy for sustainable development. This contains many policies of relevance to planning for leisure and tourism (see below).

A3.17 National planning guidance relating to leisure and tourism uses is contained in several Planning Policy Guidance notes. These vary considerably in the level of detail of guidance provided. Some specific uses are referred to in several PPGs although recreation, leisure and tourism uses are not defined clearly. The following paragraphs describe the content of those PPGs which are devoted to the relevant uses and also to general PPGs which contain guidance applicable to leisure and tourism uses. As the interpretation of policies has been clarified by appeal decisions by the Minister and by judicial review, a summary of several appeal decisions is also given.

**PPG17 Sport and Recreation (1991)**

A3.18 PPG17 gives guidance on the assessment of opportunities and needs for sport and recreation provision and safeguarding open space with recreational value. It contains no explicit references to the principles of sustainable development although, in relation to policies for open space, it notes that these have to be set within a planning framework which takes full account of the communitys need for development and conservation of all kinds (para 4).

A3.19 The guidance note concentrates on sport, open space and informal recreational use of
the countryside and makes no specific mention of many of the leisure uses, and particularly those provided by the commercial sector, covered by this research. In relation to sport and recreation uses, PPG17 stresses that:

- they are important components of civilised life;
- participation can improve an individual's health and sense of well-being;
- promotion of sporting excellence can help foster civic and national pride; and
- they have a valuable social and economic role (para 2).

**A3.20** The guidance note states that it is the policy of Government to promote the development of sport and recreation in the widest sense:

- to enable people to participate in sport, whether as players or spectators;
- to encourage the provision of a wide range of opportunities for recreation, so that people can choose those that suit them best; and
- such opportunities should, where possible, be available to everyone (para 3).

**A3.21** LPAs are advised to ensure that adequate land and water resources are allocated in development plans both for organised sport and for informal recreation. In their development control decisions, they are advised to take full account of the community's need for recreational space, to have regard to current levels of provision and deficiencies and to resist pressures for the development of open space which conflict with the wider public interest (para 3).

**A3.22** Guidance is given in relation to a number of specific types of development (e.g. football stadia, golf, air sports, water sports, playing fields and open space) and to particular locations (e.g. urban areas, the urban fringe, Green Belts and the countryside). Much of the locational advice relates to the need to protect open space in urban and rural areas. There is no locational advice relating to many of those leisure uses that are major generators of travel demand.

**A3.23** It is now eight years since the publication of PPG17 in September 1991. The growth of sport and leisure activities was a factor that led to the Government giving an undertaking to commission a review of the effectiveness of the guidance in 1995. Subsequent organisational changes, the publication of more recent PPGs of relevance to sport and recreation and the Government's commitment to the pursuit of principles of sustainable development gave added impetus to the need for review. The research commissioned following this undertaking has been completed and the Minister for the Regions, Regeneration and Planning announced to the House on 29 July 1998 that planning guidance on sport and recreation (PPG17) would be revised (see endnote 7).

*PPG21 Tourism (1992)*
A3.24 PPG21 emphasises the importance of tourism to the national and local economy but stresses the need for planning policies to balance these positive effects with the need to protect the environment from negative impacts. Guidance stresses the need to comply with the Government's environmental strategy that has as its objective the achievement of sustainable development.

A3.25 The guidance note states that tourism cannot be regarded as a single or distinct category of land use and is made up of "a wide range of very different activities and operations. These include accommodation, catering, transport, tourism attractions, information provision and all other amenities and facilities designed to cater for the needs of visitors." (para 3.3). The overlap with related areas such as sport, entertainment, the arts and other recreation and leisure activities is noted.

A3.26 The advice in PPG21 is general in nature, stressing the need to cater for tourism developments whilst protecting the environment and outlining some of the issues which should be taken into account in assessing planning applications. There is little guidance on the preferred location of developments and little guidance on specific uses other than hotels and caravan sites. Even in relation to these uses, the guidance merely sets out some of the main issues to take into account in assessing applications; many of these issues are covered in other PPGs. There is no clear guidance to local authorities concerning ways in which to adhere to the principles of sustainable development in drawing up policies or determining applications.

**PPG13: Transport (March 1994)**

A3.27 The crux of PPG13 is accessibility. It gives advice on the preferred location of developments, including facilities for leisure and tourism. The key aims are to reduce the need to travel, especially by car, and to encourage alternative means of travel which have less environmental impact.

A3.28 PPG13 notes that leisure travel is the fastest area of traffic growth. It advises local authorities to ensure that major new attractions (such as sports stadia or leisure parks) are readily accessible by a range of means of transport and where possible use sites in existing urban areas (para 3.11).

A3.29 It advises local authorities to formulate local plan policies to concentrate facilities in town centres and other locations well served by public transport and that they should provide town centre locations for cinemas and theatres to give vitality in the evenings. In addition, it advises that local leisure and entertainment facilities should be maintained and encouraged and that attractive and accessible local play areas, public open space and other recreation facilities should be provided (para 3.12).

A3.30 The guidance states that the mix of development in a locality determines its attractiveness and vitality. For example, planning for a variety of uses - shops and restaurants - on the ground floor of developments will help to keep streets lively (para 3.16). It states that LPAs should actively encourage, through their own actions and their plans, a wide range of facilities at the local neighbourhood level, including improved facilities for walking and cycling, to help reduce the need for people to use cars to meet their day-to-day needs (para 3.17).

A3.31 Guidance is provided also on car parking, provision for pedestrians and cyclists, traffic
management, public transport and park-and-ride schemes as well on general and detailed highway issues. Another topic of relevance to the research is the advice on motorway and roadside service areas (Annex A).

**A3.32** Much of the locational guidance was incorporated in the revised version of PPG6 which, in addition, introduced additional advice on the selection of sites and the assessment of developments. Subsequently, the Government has issued a transport White Paper and a Draft Revision of PPG13 (see below).

**PPG6 Town Centres and Retail Developments (June 1996)**

**A3.33** The guidance in PPG6 relates not only to retailing but also to all other important town centre uses, including leisure uses. There is limited reference made to tourism uses, other than in relation to their role in adding variety to town centres.

**A3.34** The objectives of PPG6 are:

- to sustain and enhance the vitality and viability of town centres;
- to focus development, especially retail development, in locations where the proximity of businesses facilitates competition from which all consumers are able to benefit and maximises the opportunity to use means of transport other than the car;
- to maintain an efficient, competitive and innovative retail sector; and,
- to ensure the availability of a wide range of shops, employment, services and facilities to which people have easy access by a choice of means of transport.

**A3.35** PPG6 states that town and district centres should be the preferred locations for developments that attract many trips, and stresses the need for a plan-led approach to promoting such developments in town centres. It emphasises the sequential approach to selecting sites for development, for retail, employment, leisure and other key town centre uses. Tourism uses are not explicitly referred to as such.

**A3.36** It advises that regional planning guidance should set out the development strategy for each region, indicating the role that the network of town centres should play (para 1.4). Structure Plans and UDP Part 1s should set out the hierarchy of centres and the strategy for locating uses which generate many trips (para 1.5). Local plans and UDP Part IIs should consider existing provision and identify sites for development (para 1.6).

**A3.37** In preparing their plans, LPAs are advised:

- to plan positively for uses, including leisure and recreation, which generate many trips and should be well served by public transport;
- to work with the private sector to assess need or market demand;
- to identify sites for development (para 1.7). Where such sites have not been identified they
are advised to draw up development briefs for key town centre sites (para 1.9); and

- to indicate in plans what action they will take to accelerate the process of site assembly where required (para 1.6).

A3.38 The guidance states that diversification of uses in town centres should be encouraged because of the contribution this makes to town centre vitality and viability. A range of uses is listed as adding variety, including "leisure and entertainment facilities, museums and libraries, hotels and conference centres restaurants, pubs, bars and cafes". (para 2.12).

A3.39 Authorities are advised to develop a clear strategy and policies for uses that support the evening economy of their town centres, addressing the needs for access, safe and secure car parking, good street lighting and complementary uses, such as restaurants, cafes and pubs (para 2.19). They are advised also to encourage the conversion of vacant office and retail premises to leisure or other uses (para 2.15).

A3.40 PPG6 provides guidance on assessing new leisure developments. In para 4.5, it states "for leisure, entertainment and other evening uses, the implications for the evening economy of the town centre should also be assessed in addition to the tests outlined above." The tests, as summarised in para 1.16, are:

- the likely harm to the development plan strategy;
- the likely impact on the vitality and viability of existing town centres, including the evening economy, and on the rural economy;
- their accessibility by a choice of means of transport; and
- their likely effect on overall travel patterns and car use.

A3.41 Guidance is given on the range of indicators, which can prove useful in assessing the likely impact of out-of-centre developments (Fig 1, PPG6), and authorities are advised to take a long-term view in assessing impact. These are:

- diversity of uses;
- retailer representation;
- shopping rents;
- proportion of vacant street level property;
- commercial yields on non-domestic property;
- pedestrian flows;
- accessibility;
• customer views and behaviour;
• perception of safety and occurrence of crime; and
• town centre environmental quality.

A3.42 Detailed guidance on the approach that should be taken by LPAs and developers when seeking sites in the preferred town centre and other accessible locations is set out. The sequential approach means that "the first preference should be for town centre sites ... followed by edge-of-centre sites, district and local centres and only then out-of-centre sites that are accessible by a choice of means of transport." Before this approach is adopted, however, an assessment of the need or capacity for further developments must be undertaken; if there is no need or capacity then no new sites will be necessary (para 1.11).

A3.43 PPG6 states that the sequential approach should be applied to all key town centre uses which attract a lot of people, including entertainment and leisure (para 1.15). Tourism uses are not mentioned explicitly.

A3.44 In applying the sequential approach, PPG6 advises that developers and LPAs need to be flexible and realistic in their approach. Developers and retailers "will need to be more flexible about the format, design and scale of the development, and the amount of car parking, tailoring these to fit the local circumstances." For their part, LPAs "should be sensitive to the needs of retailers and other town centre businesses and identify, in consultation with the private sector, sites that are suitable, viable for the proposed use and likely to become available within a reasonable period of time." (para 1.12).

A3.45 Whilst the positive economic benefits of leisure to the evening economy of town centres is emphasised in guidance, PPG6 notes also the need to control the adverse impacts of leisure uses. Para 2.21 states that "Leisure uses may disturb nearby residents. Before granting planning permission, LPAs should ensure that the design of the development and the conditions attached mean that the amenities of nearby residents are fully considered, not least to avoid subsequent refusal of licenses on amenity grounds."

A3.46 In relation to pubs, cafes and restaurants, the note states that these uses can make a positive contribution to diversification but can cause local problems eg loss of retail outlets, traffic, parking and local residential amenity.

PPG1: General Policy and Principles (February 1997)

A3.47 PPG1 emphasises three themes which "underpin the Governments approach"; sustainable development, mixed use and design (para 3). Leisure and tourism feature in passing, or by implication. It is not covered as a policy area in itself, although the principles expressed in the guidance are obviously of relevance to leisure and tourism uses as much as any other uses. The Governments Strategy for Sustainable Development is outlined below.

A3.48 The Guidance repeats the key objectives of PPG6 relating to town centres (para 26). In addition, it states that local authorities are encouraged to adopt a sequential approach to site selection for new retail development and other key town centre uses. The latter are assumed
to include leisure and entertainment uses as they are listed as such in PPG6 (para 18); it is less clear from the guidance whether they include tourism uses. It emphasises that for out-of-centre developments, the onus is on the developer to demonstrate that he has thoroughly assessed all potential town centre and edge-of-centre options (para 27).

A3.49 LPAs are advised to include policies to promote mixed uses and to identify individual sites in their development plans. In town centres and elsewhere, mixed use development is seen as a way of "creating vitality and diversity" and reducing the need to travel (para 8). Mixed use is not defined. The need for good transport links and minimising car use are emphasised. It is suggested that, to encourage developers to come forward, planning standards may need to be flexibly applied. Authorities are advised to consider whether an urban village or similar high-quality mixed use developments would be appropriate to their area. Among their characteristics are "compactness", mixed dwelling types and "a range of employment, leisure and community facilities" (para 12).

A3.50 The importance of urban design is recognised in all areas but "Particular weight should be given to the impact of development on existing buildings and on the character of areas recognised for their landscape or townscape value such as National Parks, Areas of Outstanding Natural Beauty and Conservation Areas" (para 18). The importance of protecting and conserving the historic environment is stressed (para 32) but no mention is made of tourism.

The Governments response to the Fourth Report from the House of Commons Select Committee on the Environment (July 1997)

A3.51 In the most recent statement of its position on leisure development, the Government indicated its firm commitment to the objectives of PPG6, to make town centres the focus for investment. In addition, it stated it expects PPG6 to be "applied just as firmly to leisure developments as to retail developments" (para 9). The statement does not indicate whether the guidance applies to tourism uses.

A3.52 It stated that LPAs should plan positively for leisure in developments plans, using the sequential approach to identify locations and sites for developments and where appropriate identifying areas where leisure uses can be grouped, such as leisure quarters within or on the edge of city centres.

A3.53 The Government provided some elaboration of the advice that developers need to be flexible in their approach. Rather than proposing large-scale leisure developments that can only be accommodated out-of-centre, developers should demonstrate why "they could not develop elements of larger schemes on sites in more central locations." (para 10). In order to fit schemes onto more central sites, the Government emphasises that car parking should be reduced.

The Transport White Paper

A3.54 In July 1998, the Government issued a transport White Paper (see endnote 8) that set out the Governments integrated transport policy, which was designed to extend choice in transport and secure mobility in a way that supports sustainable development (1.5). The White Paper states that "the way forward is through an integrated transport policy". This means
integration:

- within and between different types of transport;
- with the environment;
- with land-use planning; and
- with policies for education, health and wealth creation (para 1.22).

The White Paper states that the Governments overall approach to planning is aimed at containing the dispersal of development, so reducing the need to travel and improving access to jobs, leisure and services.

A3.55 The White Paper stated that the publication of PPG13 was a major step towards planning land-use and transport together, and noted that it aimed to reduce the need to travel, especially by car, and to encourage means of travel which are more environmentally friendly (4.160). The White Paper announced that the Government would build on this change of direction, and update planning guidance notes on Transport, Development Plans and Housing (4.161).

Ministerial Answer to a Parliamentary Question, 11 February 1999

A3.56 In a recent answer to a Parliamentary Question, the Planning Minister added to, and provided clarification on, several aspects of the Governments policy on shopping and leisure in the light of recent litigation. He said that planning authorities should take into account the need for the development when deciding planning applications for such developments outside town centres.

A3.57 He re-iterated the advice in PPG6 and explained that the test of need should be applied to proposals for retail and leisure development. In addition, he clarified the approach to be taken to the assessment of need, the search for sites and the treatment of applications for extensions to existing facilities.

A3.58 In relation to the test of need, the Minister stated that "Proposals for new retail and leisure development which accord with an up-to-date strategy or are proposed on sites within an existing centre, should not be required to demonstrate that they have satisfied the test of need because this should have been taken into account in the development plan.

However, proposals which would be located at an edge-of-centre or out-of-centre location and which:

- are not in accordance with an up-to-date development plan strategy; or
- are in accordance with the development plan but that plan is out of date, is inconsistent with national planning policy guidance, or otherwise fails to establish adequately the need for new retail and leisure development and other development to which PPG6 applies, should be required to demonstrate both the need for additional facilities and that a
In the context of PPG6 and this additional guidance, the requirement to demonstrate need should not be regarded as being fulfilled simply by showing that there is capacity (in physical terms) or demand (in terms of available expenditure within the proposals catchment area) for the proposed development. Whilst the existence of capacity or demand may form part of the demonstration of need, the significance in any particular case of the factors which may show need will be a matter for the decision-maker.

A failure to demonstrate both the need for such proposals and that a sequential approach has been applied in selecting the application site would normally justify the refusal of planning permission unless there were weighty additional material planning considerations."

A3.59 In relation to the application of the sequential approach, the Minister advised that "...the relevant centres in which to search for sites will depend on the nature and scale of the proposed development and the catchment that the development seeks to serve. The scale of such proposals should also be appropriately related to the centre - whether town, district or local - the development seeks to serve."

A3.60 The Minister also said that the policy in PPG6, and the additional guidance in his Parliamentary Answer, should be applied equally to proposals for extending existing edge-of-centre and out-of-centre development which creates additional floorspace; LPAs should treat such proposals as if they were new development. Again, there was no mention made of tourism developments.

**Strategy for sustainable development**

A3.61 In May 1999, the Government published its White Paper on sustainable development (see endnote 9). The Government will use the Strategy as a framework to guide its policies, including those relating to planning for leisure and tourism.

A3.62 The Strategy has four main aims:

- social progress which recognises the needs of everyone;
- effective protection of the environment;
- prudent use of natural resources; and
- maintenance of high and stable levels of economic growth and employment.

A3.63 These aims, and the indicators designed to monitor the progress towards achieving them, are relevant to all forms of development including leisure and tourism. The emphasis throughout the strategy is on developing our economic and social capital while exercising sound stewardship over the environment.
A3.64 The Strategy refers to tourism and leisure as one of five major categories of final consumption which are identified as key areas for action. Most of the commentary relates to tourism rather than leisure development. The Strategy notes that tourism is a major industry in Britain and states that the "Government wishes to see the UK tourism industry grow significantly, in ways which are economically, socially and environmentally beneficial." (para 6.71)

A3.65 The Strategy notes that the approach set out in Tomorrows Tourism (see endnote 10) includes:

- "establishing an effective policy framework: a new strategic body will lead in developing sustainable tourism. The forthcoming Urban and Rural White Papers will take account of tourism's contribution to quality of life;"
- "maximising tourism's potential to benefit communities, by encouraging local goods, services and employment, and tourism's role in improving local environments;"
- "managing visitor flows, through more effective visitor management plans;"
- "addressing transport and planning issues: integrating tourism with public transport, and ensuring that tourism development respects the local built and natural environment; and"
- "building partnerships between public, private and voluntary sectors: for example, the Building Research Establishment is planning a new programme to reduce energy consumption by tourism businesses." (para 6.71)

A3.66 Increased access to tourism for all is included as a priority in the Strategy (para 6.72)

A3.67 The discussion of tourism and leisure as a key area concentrates on tourism. However, the indicators designed to measure progress refer to tourism and leisure developments. The most relevant indicators relating to planning for leisure and tourism are:

- pressure on key sites (to be developed); and
- leisure trips by mode of transport.

A3.68 The Strategy stresses the need to build sustainable communities and the need for policies, including planning policies, which make the links between factors that contribute towards peoples quality of life. The Strategy notes that "policies on urban living go hand in hand with those to protect the countryside" and that "locating development and services to reduce the need for travel is essential if we are to tackle road traffic growth and climate change." (para 7.2).

A3.69 The Strategy states that "the Government will give local authorities a new duty to promote the economic, social and environmental well-being of their areas." (para 7.80), and stresses the need for integrated policies relating to the promotion of economic vitality and employment, meeting social needs and shaping our surroundings. Planning policies will need
Planning for leisure and tourism clearly has a role in the promotion of economic vitality. In relation to the meeting of social needs, several relevant aims are set out. The Strategy sets out the aim of achieving "less travel, better access" and re-iterates the aims and policy measures included in the Government’s Transport White Paper. It also stresses the importance of access to culture and sport, that the arts and sport make a significant contribution to quality of life and should be accessible to everyone, and that they can also contribute significantly to regeneration and bringing communities together.

The Strategy re-iterates the vital role that planning can play in shaping our surroundings in line with PPG1. "In order to create more sustainable patterns of development, we need to:

- concentrate the majority of new development within existing urban areas;
- reduce the need to travel in planning the location of new development;
- re-use previously developed land, bring empty homes back into use and convert buildings to new uses,
- extend existing urban areas rather than building new isolated settlements; and
- encourage a high quality environment with the provision of green spaces." (para 7.56)

The Strategy states that regeneration, social inclusion and more sustainable patterns of development should be promoted by land-use planning policies. It states that "in particular, shopping, leisure and entertainment, offices and other key town centre uses should, wherever possible, be located within existing centres" (para 7.57). The need to apply the sequential approach of PPG1 and PPG6 is emphasised, as are other aims of PPG1; encouraging mixed use developments, and encouraging high density developments near existing transport corridors and town centres. The Strategy states also that the planning system will be used to promote safe and convenient links between homes, jobs and facilities, by cycling, walking and public transport.

A chapter of the Strategy is devoted to Managing the Environment and Resources. Issues addressed that are of particular relevance to planning for leisure and tourism include the need to protect the wider landscape and protect and enhance wildlife. Other issues, such as the need to reduce emissions and protect the quality of our air, water and soil will be of relevance to some leisure and tourism developments.

The Revision of PPG13 Transport: Public Consultation Draft

In October 1999 the DETR published a Draft Revision of PPG13. This builds on the approach of PPG13 and PPG6, and contains guidance generally and explicitly relevant to leisure and tourism uses.

It is primarily aimed at promoting better integration between planning and transport and between different transport modes and achieving more consistent implementation of the
existing policy approach. The objectives of the guidance are to integrate planning and transport at all administrative levels to promote more sustainable transport choices, and reduce the need to travel, especially by car (para 4). The guidance states that this "will help to ensure that the planning system plays its part in the Government's strategy on sustainable development, including promoting social inclusion in both urban and rural areas and revitalising towns and cities as places to live and work." (para 4).

A3.76 The guidance lists a series of "main planning policies". Advice to local authorities includes:

- ensuring local transport plans and development plans are closely linked and complement one another;
- focusing major generators of travel demand in city, town and district centres and near to public transport interchanges;
- locating local and day to day facilities which need to be near their clients in local centres;
- locating development in rural areas, for housing, jobs, shopping, leisure and services in local service centres;
- using parking policies to promote sustainable transport choices and reduce reliance on the car;
- giving priority to people over traffic in town centres, other areas with a mixture of land uses and local neighbourhoods; and
- ensuring that the needs of disabled people are taken into account.

A3.77 The Draft Guidance sets out an overall approach on jobs, shopping, leisure and services. This sets out further guidance on the application of the main planning policies, under five headings:

- accessibility the need for developments to be highly accessible by public transport, walking and cycling;
- linking planning and transport the need for development plans and transport plans to be closely linked and to complement one another;
- partnership emphasising that responsibility for implementing policy should be shared between developers, local authorities and transport operators;
- assessment that Transport Assessments, assessing accessibility by all modes of transport, be submitted with major developments and should replace the narrower Traffic Impact Assessments; and
- key sites to make maximum use of the most accessible sites by allocating or reallocating those sites highly accessible by non-car modes for travel intensive uses at sufficient densities, and allocate or reallocate sites less accessible by non-car modes for uses that
A3.78 The Draft Guidance notes the important role of design in encouraging the use of non-car modes, and the role of mixed use development at local and strategic levels in promoting vitality and diversity and promoting walking and other sustainable modes. The needs of disabled people for accessible public transport, adequate and well-located parking and a well-designed pedestrian environment are stressed.

A3.79 In relation to leisure uses the Draft PPG re-emphasises that existing town centres should be the preferred locations for travel intensive leisure developments, and confirms that a sequential approach should be adopted to the identification of preferred locations and the selection of sites for new leisure developments. Where there is a need for a development and it cannot be accommodated in or on the edge of existing centres, the guidance advises that it may be appropriate to combine them with existing out of centre developments, provided that improvements to public transport can be negotiated (para 23).

A3.80 The draft guidance also advises LPAs that in determining the acceptability of leisure and tourism proposals which are sited near to existing buildings, monuments, physical features or landscapes and which generate large amounts of travel, they should consider the extent to which the proposed development needs to be in that particular location. They are advised to pay particular attention to the scale, layout, parking and access arrangements and seek measures to increase access to the site by sustainable transport modes, and the use of traffic management and appropriate parking policies near to the site (para 24).

A3.81 The same overall policy approach to leisure is required in rural areas to help promote social inclusion and reduce rural isolation for those without a car (para 26). The objective should be to ensure that jobs, shopping, leisure facilities and services are primarily sited at the most accessible locations in the local area, or where accessibility will be improved as a result of the transport plan provision or other measures that the local authority intends to take.

A3.82 The Draft Revision to PPG13 stresses the need to achieve lower levels of parking in association with development than has generally been achieved to date. It states that development plans should set maximum levels of parking for broad classes of development, and sets out some national maximum parking standards for several uses, including stadia, cinemas, conference facilities and D2 uses including leisure. No standard is set for hotels or other tourism facilities. The guidance states that authorities should not require minimum parking requirements for development (para 34). Draft revised PPG13 also encourages the shared use of parking, particularly in town centres. For example, offices and leisure uses can share parking because the peak levels of use do not coincide (para 33).

A3.83 In relation to the implementation of planning policies on transport, authorities are advised to take a more pro-active approach using conditions and planning obligations where appropriate to deliver more sustainable transport solutions. These instruments may be used to secure on-site transport measures or green transport plans. In relation to planning obligations, the Draft guidance states that it is appropriate for these to be used to achieve improvements to public transport, walking and cycling. The guidance notes, however, that the practices adopted by some authorities to seek such contributions in lieu of parking that is not being provided on site are inappropriate as authorities should not be seeking minimum parking
standards. The guidance provides advice on, and support for, the use of green transport plans, and park and ride schemes.

A3.84 The Draft Guidance advises local authorities to use their planning and transport powers to give greater priority to walking and cycling. Within the context of the local transport plan, local authorities should also work in partnership with public transport providers and operators and use their planning and transport powers to improve public transport in ways which will reinforce the effectiveness of location policies in the development plan (paras 52-60).

Regional Planning Guidance

A3.85 There is little advice in the PPGs relating to the need for policies for leisure and tourism uses in regional planning guidance. Some guidance relating to leisure and tourism is included in the consultation draft of revised PPG11 Regional Planning. The advice on the leisure content of RPGs given in PPG17 is devoted largely to sport, informal recreation, the natural environment and open land; there is no reference to the need to consider other leisure uses, such as commercial leisure.

A3.86 The leisure and tourism content of 11 RPGs dating from 1989 (Tyne and Wear) through to 1998 (West Midlands) was reviewed to investigate whether it contained any guidance related to leisure and tourism uses. The RPGs, as is natural, reflect PPGs but there is surprisingly little regional-specific advice or assistance relating to the leisure and tourism uses covered by this research. The occasional suggestions for areas of need or locations for development only serve to point up the general lack of content in the tourism and leisure sectors.

A3.87 Most of the RPGs tend towards generalities. "Provision should be made for new, high quality tourism related development so that resorts can adapt to the changing demands of holiday makers. Environmental enhancement and the re-use of sites and buildings should be pursued" (RPG10 July 1994 South West). Even RPG11 West Midlands, which was re-issued in 1998 and is in many ways the most advanced, has few specifics when it comes down to tourism, sport and recreation. For example:

- Tourism; "In North Staffordshire, the Black Country and Coventry, there is potential for providing new facilities at a regional scale"(8.2). There is no elucidation of the possible nature of, or demand for, these facilities; and
- Sport and recreation; "The region has many important national and regional sporting facilities. The need for further development or relocation of such facilities and of other sporting sites should be addressed in development plans"(8.6). No assessment is given of need or of the regional situation.

A3.88 RPG3: Strategic Guidance for London Planning Authorities (May 1996), provides rather more guidance on leisure and tourism developments than do the other RPGs although its advice often re-emphasises, rather than elaborates upon, national guidance. In relation to hotel development, it identifies a general need for more accommodation and a specific need for accommodation of different price ranges. It also refers to locational criteria eg close to public
transport, town centres and attractions; the need for setting down facilities.

A3.89 It suggests that leisure is one of the uses that would benefit the community by being located in town centres, and if dispersed away from town centres "unsustainable patterns of travel will result and the vitality and viability of centres will be threatened" (para 5.12). It encourages mixed use development in town centres (para 5.12), recognises the opportunities for arts related developments to be located in or around town centres, and states that "out-of-centre, car dependent leisure and entertainment facilities should be discouraged." (para 3.27). In relation to car parking, the Guidance states that "the amount of traffic generated by new developments should be minimised by placing maximum limits on the levels of off-street car parking permitted..." (para 6.51).

A3.90 The growth and importance of tourism is widely acknowledged but little account is taken of the expansion of leisure spending and the leisure industry over recent years. Guidance concentrates on sport and recreation (seen as mainly outdoor activities). In more recently published guidance there is more direct reference to the strategic issues relating to some uses, although this still tends to concentrate on sport and recreation (eg open space in RPG3) rather than commercial leisure or A3 uses.

A3.91 There is no specific mention of commercial leisure uses, such as multiplex cinemas, or of the evening economy. However, it could be argued that such activities are included by implication since recreation uses are pointed up as a means of maintaining or improving town centre vitality. Many documents recommend that new facilities should be concentrated in existing town centres or where there are good transport links, but the sequential test is not specifically mentioned.

A3.92 Although the majority of the RPGs express concern that visitors can cause unacceptable stresses for inhabitants and/or the natural or built environment, only one, RPG12 (Yorkshire and Humberside), suggests that plans should require developers proposing a rural location to justify the need for such a site and assess the likely environmental impact (9.4). The guidance states that the environment should take precedence over development.

A3.93 Kingston upon Hull City Council has taken the lead in reviewing the current RPG12 (March 1996), with particular reference to the relationship between major commercial leisure developments and the future role of town centres. The proposed changes merely reflect changes to national policy guidance; they do not provide detailed locational guidance.

A3.94 Since RPG3 was published, the London Planning Advisory Committee (LPAC) has published Draft Supplementary Advice on large commercial leisure developments in London and advice on the A3 Use Class. These documents provide a number of recommendations aimed at Central Government, the Government Office for London, London Boroughs and operators and developers. It is not however Regional Planning Guidance, and has no statutory weight.

A3.95 The Regional Planning Guidance consultation paper (DETR, 1998) stated that the Government believes improvements are necessary to the system of regional strategic planning in order to:
facilitate the delivery of a sustainable pattern of development;
assist the RDAs in delivering their programmes of economic development;
help deliver an integrated transport strategy at the regional level;
provide a more coherent context for decisions on major projects; and
help speed up the preparation and regular updating of statutory development plans.

A3.96 The Government is currently in the process of reviewing guidance on regional planning. Future advice on regional planning will no longer be included in PPG12; instead, the advice on development plans and regional planning will be published in separate PPGs. In February 1999 the Government published public consultation drafts of PPG11 Regional Planning and published Revised PPG12 Development Plans in December 1999.

A3.97 The public consultation draft of PPG11: Regional Planning contains a chapter entitled Retail, hospitals, leisure and sports uses and provides detailed guidance on sports and physical recreation developments (paras 7.2 and 7.3). In relation to major entertainment facilities, it states that considerations similar to those applying to major retail developments should be applied to such uses. Such considerations include the need to assess the need for major new facilities or large-scale expansion of existing facilities of regional or sub-regional importance, taking account of forecasts of demand for the region. It states that there is "unlikely to be scope for major additional out-of-town facilities without adversely affecting the vitality and viability of existing centres and the environment more generally, including through unsustainable pressures on the road network" (para 7.1).

A3.98 The draft guidance states that it is of crucial importance to monitoring the implementation of new style RPGs that much more systematic use is made of quantified regional and sub-regional targets that provide a benchmark for RPG success. One of the areas where the guidance states that targets might be set for RPGs is retail and leisure. The example given for such targets are "plan allocations and development of town centre versus out-of-town retail (and by implication leisure) floorspace."

A3.99 The references to tourism developments in the draft guidance are confined to a single paragraph within the chapter entitled Other topics. It emphasises the need for liaison between RPBs and RTBs in drawing up RPG. "The Governments policies for sustainable tourism at regional and local level will be set out in the tourism strategy due to be published shortly. National planning advice is contained in PPG21. RPBs will need to liaise with the Regional Tourism Boards (RTBs) to ensure that RPG takes account of the needs of current and future visitors as well as the needs of local residents. RPBs will also need to consider with the RTBs:

- whether there are potential new regional or sub-regional tourist facilities for which locational criteria need to be specified in RPG; and
- how to encourage tourism development to assist in the implementation of RPG" (para 13.3).
A3.100 Much of the general guidance in the draft PPG is as applicable to leisure and tourism uses as it is to any other uses. A major new proposal in the RPG is the need for RPG to include a sustainable development appraisal of the impacts of different strategic options "in order to integrate sustainable development objectives in the formulation of policy" (para 2.23).

A3.101 The Draft PPG explains the enhanced responsibility of the regional planning conferences, or similar bodies, which currently comprise the regional planning bodies (RPBs). These conferences, of the local planning authorities in the region, will work with the Government Offices and regional stakeholders, to produce draft RPG. The Government considers that this enhanced responsibility for the production of the guidance will lead to increased commitment to implementation and greater accountability for the outcome.

Endnotes
Appendix IV: Survey Parameters

Planning for leisure LPA surveys

**A4.1** Two postal questionnaire surveys of local planning authorities were undertaken for the leisure research project. The first survey was undertaken in 1998. A second survey was undertaken in 2000 in order to update some of the results.

<> **A4.2** The primary purposes of the first survey were to reveal the ways in which local authorities plan for leisure, to discover the problems they face and what they would like to see by way of future guidance. The objectives of the survey were to identify:

- how local authorities deal with leisure uses in their development plans; whether they have undertaken surveys of need/demand, identified sites, imposed relevant policies;
- how local authorities deal with leisure uses in development control; whether the development plans are adequate, what criteria are used for ad hoc decisions etc;
- the views of local authority planners on legislation and national planning policy relating to leisure uses; and
- potential case studies.

**A4.3** Questionnaires were posted to all local planning authorities in England in June 1998. The questionnaire sought a mixture of factual information and opinion concerning planning for leisure in each authority, and asked authorities to enclose any relevant documents with their response.

**A4.4** Responses were received from 199 authorities (51%). Two authorities wrote to say that they could not complete the questionnaire. Ten authorities responded after the closing date. Many authorities sent additional documentation.

**A4.5** Good coverage was achieved over the whole country although the response rate varied between regions, between different types of authority, and between urban and rural authorities. Details of these variations are set out below.

**A4.6** The regional variations in the response rate do not seem to be related to any variations in pressure for leisure development or in economic circumstances. It would seem more likely that they reflect the level of resources available and the workloads of authorities. This may explain also the variation in the response rate between different types of authority, although it is likely that the higher response rate of urban authorities is a reflection also of the greater importance of leisure development issues in urban areas.

**Table A4.1**: Responses to 1998 leisure survey by region - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.
Table A4.2: Responses to 1998 leisure survey by type of authority - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

Table A4.3: Differences in response rates between rural and urban areas - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

A4.7 103 of the 180 non-County authorities gave examples of applications dealt with over the last two years. A total of 213 relevant examples were given. The provision of examples was much greater from urban authorities than from rural authorities. This is probably a reflection of the higher level of development pressure for major leisure schemes in urban areas. It may in part, however, also reflect the level of resources available in rural authorities.

Supplementary leisure survey 2000

A4.8 In January 2000 it was felt appropriate to revisit and update some of the responses before publication of the report could be considered. In March 2000 a new questionnaire was posted to those authorities that had stated, in 1998, that they did not have policies referring to the sequential approach in either their adopted or emerging development plans. The questionnaire was designed to reveal whether such authorities had made efforts to incorporate such policies and other PPG6 and PPG13 compliant policies in their plans.

A4.9 Questionnaires were sent to 123 LPAs on 16 March 2000. Responses were received from 81 LPAs (a 66% response rate). Of these 18 had adopted plans since the earlier survey and 40 had made changes to their emerging plans. Good coverage was achieved over the whole country with little variation between the response from different regions.

Planning for tourism LPA survey

A4.10 The primary purposes of the survey was to reveal the way in which local authorities plan for tourism, to discover the problems they face and what they would like to see by way of future guidance.

A4.11 The objectives of the survey were to identify:

- how local authorities deal with tourism uses in their development plans; whether they have undertaken surveys of need/demand, identified sites, imposed relevant policies;
- how local authorities deal with tourism uses in development control; whether the development plans are adequate, what criteria are used for ad hoc decisions etc;
- the views of local authority planners on legislation and national planning policy relating to tourism uses; and
- potential case studies.

A4.12 303 questionnaires were posted to all English local planning authorities in January 1999, with the exception of those that indicated in the Planning for Leisure survey that they would not
be able to respond to the Planning for Tourism survey. The sample included all National Park Authorities.

A4.13 The questionnaire sought a mixture of factual information and opinion concerning planning for tourism in each authority, and asked authorities to enclose any relevant documents with their response.

A4.14 Responses were received from 156 authorities (51%). Three authorities responded after the closing date. Many authorities sent additional documentation.

A4.15 Good coverage was achieved over the whole country although the response rate varied between regions, between different types of authority, and between urban and rural authorities. Details of the variations are set out below.

A4.16 The regional variations in the response rate do not seem to be related to any variations in pressure for tourism development or in economic circumstances. It would seem more likely that they reflect the level of resources available and the workloads of authorities. This may explain also the variation in the response rate between different types of authority, although it is likely that the higher response rate of urban authorities is a reflection also of the greater importance of tourism development issues in urban areas.

Table A4.4: Responses to the tourism survey by region - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

Table A4.5: Response to tourism survey by type of authority - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

Table A4.6: Differences in response rates between rural and urban areas - available from the 'Figures and tables' page from the 'Planning for leisure and tourism' index.

The private sector (leisure) survey

A4.17 In the summer of 1998, self-completion questionnaires were sent to 104 companies with experience of leisure development (see endnote 12). Thirty-four companies (33%) returned the questionnaires. Of the respondents, 54% were property companies that deal with development, 35% were companies that are operator/developers ie companies that build for their own occupation and 4% were Funds that had undertaken development ie companies that provide their own capital for development and retain completed developments as investments. The remainder comprised other types of developers. Three weeks after the initial mail-out all non-respondents were contacted to try and increase response rates.

A4.18 The companies were asked which leisure sectors they were involved with ie cinema, bowling, pubs/bars, health and fitness centres, bingo, nightclubs, restaurants, hotels, and/or other sectors. The replies showed that the cinema sector was heavily favoured, 65% had dealt with this sector. Pubs/bars, health and fitness centres, and restaurants were almost as popular at 59% each. 47% had dealt with bowling, 41% with nightclubs, 38% with bingo, and 35% with hotels. There are also other forms of leisure sectors that companies had dealt with eg stadia and arts buildings. 18% had dealt with some other form of leisure sector development.
A4.19 In April 2000, all 34 respondents were written to with a follow-up questionnaire seeking an update of certain questions asked in the original survey. Questions covered market conditions, constraints on development and attitudes to smaller scale development, to see if opinions had changed, and two new questions related to:

- need, capacity and the sequential test; and
- the impact of delays upon development decisions.

A4.20 Of the 34 companies contacted, a total of 10 responded after the original letter and follow up phone calls. Of the 10 companies which responded, 6 were developers, 3 were operators and 1 was an investor.

The user surveys

A4.21 For the Bristol and Barking leisure case studies, user surveys were conducted at Dagenham and Hengrove leisure parks and in Barking and Bristol town centres in December 1998 and January 1999. Between 230 and 320 questionnaires were completed at each of the four locations ie:

- 320 at Dagenham leisure park;
- 273 in Barking town centre;
- 234 at Hengrove leisure park, Bristol; and
- 300 in Bristol town centre.

A4.22 The user surveys gathered information on user profiles, access to leisure facilities, the nature of the leisure trip, attitudes towards leisure destinations etc.

The private sector (tourism) survey

A4.23 Self-completion questionnaires were sent out to 104 companies/organisations with experience of tourism development and/or operation (see endnote 13). The sample included both commercial and non-commercial operators and developers spanning a broad spectrum of tourism businesses, including hotels, holiday centres, caravan sites, self-catering accommodation, visitor attractions etc. The number of questionnaires sent out within each of the main categories is shown below:

- 47 self-catering operators (including camping, caravanning, holiday cottages, holiday centres);
- 31 hotel developer/operators; and
- 26 attraction operators and agencies.
Three weeks after the initial mail-out all non-respondents were contacted to try and increase response rates.

**A4.24** Thirty-seven companies returned the questionnaires, giving a response rate of 36%. There was a particularly good response from caravans/camp sites and holiday centres.

**Endnotes**
12. Selected by the consultants
13. Selected by the consultants
Planning obligations

A5.1 Two pieces of research in 1992 and 1993 found that the use of planning agreements (now referred to as obligations) was increasing although there were very few cases relative to the number of planning permissions (see endnote 14) (<2%).

A5.2 The 1992 (Grimley) study found that most agreements concerned park-and-ride schemes. None of the agreements contained other measures relating to contributions to, or the provision of, public transport facilities. Most highway agreements were aimed at securing immediate objectives relating to site development; only a handful related to off-site requirements such as commuted parking payments.

A5.3 The 1993 study found that the number of agreements was increasing. The study confirmed that they were primarily for infrastructure purposes. Many of these related primarily to the management of on-site development particularly relating to physical infrastructure, landscaping and open space but there was an increasing tendency towards off-site agreements to deal with wider infrastructure impacts. In the research, 38% of the issues covered related to highways, 25% to landscaping and open space, 15% to sewerage and drainage, 5% to parking, 3% to community facilities and 2% to recreational facilities. Only 1% related to public transport and there was only one relating to nature conservation.

A5.4 The 1993 study also identified a number of trends:

- the scale and scope of obligations was increasing;
- agreements increasingly related to the off-site social, economic and environmental impacts, as well as physical ones; and
- a move from ad hoc negotiation to systematic policy principles.

Issue A1: Should the nature and focus of planning obligations for leisure developments be changed to relate more closely to meeting the objectives of planning policy guidance?

A5.5 The research undertaken for this study found less than one third of LPAs had negotiated obligations in relation to leisure developments; less than one quarter in relation to tourism. Obligations relating to highway works still dominate. Despite the advice in Circular 1/97 and PPG13, relatively few LPAs were negotiating obligations relating to public transport provision. In addition, few LPAs reported obligations relating to nature conservation, despite the advice in PPG9, Nature Conservation.

A5.6 On the evidence of this research, it is not possible to comment on the extent to which LPAs should or should not have negotiated further obligations. From this, and earlier evidence, it appears that leisure and tourism developments attract a lower proportion of obligations than
the other types of development but it has not been possible to identify whether this is because of the nature of the land use.

A5.7 This research has not covered the efficacy of planning obligations but, if they are to remain in their existing form, it would seem appropriate for them to be related to the issues or potential impacts identified in this report ie economic/community or environmental. However, economic and communal impacts are generally of a local nature and it is not possible to prescribe a general focus of obligations eg the local need for a community facility.

A5.8 In terms of environmental impacts, there are two directly relevant areas for planning obligations related to leisure and tourism:

- accessibility issues are the focus of PPG6 and PPG13. On this basis, the focus of planning obligations could change more explicitly from associated highway works and commuted parking payments to payments for public transport, cycling and walking infrastructure; and
- environmental improvements contribute, for example, to the vitality and viability of town centres and the inherent attraction of the countryside. Planning obligations are already in use for landscaping, nature conservation etc but these tend to be localised, related directly to the development site eg caravan parks (cf Great Yarmouth case study).

A5.9 At a more general level, this research has indicated that the most severe problems associated with planning for leisure and tourism are more fine-grained, that they are caused by a range of management - including planning issues. For example, the developers of a new attraction may be obliged to contribute to a new information centre in the town. In this context, it would be appropriate for planning obligations to be related to the broader, identified objectives of a visitor or town centre management plan that specifically covered the amelioration of related impacts in the area.

A5.10 It will be necessary to consider whether such an approach is acceptable under current legislation and policy ie whether the complementary measures are "necessary; relevant to planning; directly related to the proposed development; fairly related in scale and kind to the proposed development and reasonable in all other respects" (see endnote 15). If not, the legislation and/or policy may need to be reviewed.

A5.11 The visitor management plan would require co-ordination with the development plan, tourism and/or leisure strategies and have to be formalised or adopted, perhaps as SPG, with clear objectives and a commitment to regular review. It should also identify a series of key projects or initiatives directly related to those objectives that could be targeted through planning obligations.

A5.12 The difficulty will be in relating development proposals and the relevant scale of obligations to the appropriate issues identified in the visitor management plan (Circular 1/97, B13). For example, what scale of obligation does a new 120 bedroom hotel justify? Obligations will have to be forged through negotiation.

CA1. The research has shown limited use of planning obligations, particularly in relation to, or for, leisure or tourism land uses and their potential impacts. Equally, very few of the obligations
have related to off-site proposals eg commuted parking payments or public transport provision although this appears to be changing.

RA1. It is recommended that the focus, rather than the scale, of planning obligations should change towards the principles of sustainable development in PPG6 and PPG13 and the amelioration of the negative impacts of tourism and leisure development.

RA2. LPAs should consider more specifically the opportunities for planning obligations relating to:

- public transport, pedestrians and cycling; and
  - environmental improvements.

RA3. Planning obligations on tourism and leisure developments might need to be related to the destination as a whole and not just the immediate site environs.

RA4. Potential impacts and the necessary ameliorating action should, where possible, be identified in the context of a visitor management plan that, ideally, should be adapted and adopted as Supplementary Planning Guidance.

RA6. Consideration will need to be given to whether to encourage the pursuit of wider objectives such as those contained in a visitor management plan, through amendment to Circulars and PPGs, or to continue to allow such measures to be limited by the parameters of current advice.

Some other minor issues

A5.13 A number of other minor issues were suggested in the course of background research but which, in consultation, did not feature as priorities for change in a particular direction, so recommendations were not considered necessary. They are recorded below for completeness:

- design. This was not a major planning issue for LPAs in relation specifically to leisure or tourism uses although design, conservation and listed building issues were raised as considerations in relation to some individual applications and new schemes can play an important role in image enhancement;

- mixed uses. This did not arise as an issue other than in the context of cross-subsidisation of different elements within leisure schemes and the identified problems of A3/D2 uses and residential amenity. The latter point has implications for policy initiatives to develop mixed - use sites; it raises the potential importance of leisure quarters and zoning/detailed design within them; and

- outdoor advertising. This was not an issue for LPAs although environmental clutter arguments have been raised. Tourism signposting on the highway is a concern in the
private sector. PPG21 needs to be updated to reflect current policy (see endnote 16). More local highway authorities need to formulate signposting strategies under the new regulations.

**A5.14** The research has focused on the A3 use class and D2 night-clubs. However, a number of other change of use issues were raised:

- alterations and changes to D2 leisure uses can occur without permission being required eg single to multi-screen, bowling to bingo where there are no external alterations and although such changes might be expected to have some environmental effects, such changes were not mentioned as issues by LPAs or developers; and
- although the control of change of use of residential to B&B and holiday cottages (and vice-versa in resorts) has not arisen as a major issue in this research, this may need to be addressed in due course, perhaps in the context of housing policy.

**Endnotes**
15. Circular 1/97, para B2
16. DoT Circular, Roads 3/95; traffic Signs to Tourist Attractions
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An examination of the effects of the UCO 1987 and the GDO 1988, DoE, 1991
Sustainable rural tourism; opportunities for local action, DNH/RDC/ETB/CoCo, 1995
A New Deal for Transport: Better for Everyone, DETR, 1998
Measuring the Local Impact of Tourism, DCMS, 1998
List Of Consultees

DETR Steering Group
Richard Longman (Chair)
Linda Rawlings (Nominated Officer)
Douglas Crockett
Michael Bach
Peter Bide
Peter Matthew
Angela Payling
Trevor Dawes, DCMS (Stage 2 only)

STAGE 1

Leisure Focus Group
Barbara Phillips, Head of Tourism Division, DCMS
Brigid Simmonds, Chief Executive, Business in Sport and Leisure
David Beales, RTPI
Roger Sykes, Local Government Association
John Wilkinson, Cinema Exhibitors Association
Stephen Wade, Whitbread Property
Stephen Mills and Kurt Janson, English Tourist Board
Jonathon Bore, Planning Inspectorate
James Spencer, Director General, British Holiday & Home Parks Association
John Lett, LPAC
Ian Cooper, Director of Leisure Services, Cambridge City Council

Bristol Case Study
Chris Marks, Strategic and Citywide Policy Team, Bristol City Council
Jon Richards, Strategic and Citywide Policy Team, Bristol City Council
John Henley, Chief Executive, THI plc
Lee Burman, Planning Services, South Gloucestershire Council
Ali Khayatian, South Gloucestershire Council
Nick Terry, Building Design Partnership
Daniel Pinstagram, Richard Ellis
Marcus Fagent, Mouchel Consulting Ltd
Justin Gartland, Nathaniel Lichfield & Partners
Ken Johnson, English Partnerships
Steve Perry, Bristol City Council
Paul Kentish, Savills

Barking and Dagenham Case Study
Andy Clarke, Chief Planning Officer, London Borough Barking & Dagenham
Chris Howl, Team Leader, Urban Regeneration, London Boro Barking & Dagenham
Tim Lewis, Senior Planning Officer, London Borough Barking & Dagenham
Anthony Hollingsworth, Planner, London Borough Newham
Salvana Mangena, Planner, London Borough Newham
Manager, Odeon cinema
Nick Scovil, Senior Manager, Spotted Dog at Barking
Keith Wood, Richard Ellis
Gary Dooley, Rank Leisure

**Norwich Case Study**
Roger Mitchinson, Planning, Special Projects, Norwich City Council
Dennis Passingham, Leisure Co-ordinator, Norwich City Council
Don Morgan, Planning Manager, Gazeley Properties
Michael Innes, Architect for Castle Mall
Bob Delafield, Norwich Union
Chris Frett, South Norfolk District Council case officer
John Warchester, Broadlands District Council, Forward Planning

**Wakefield Case Study**
Don Rankin, Wakefield Metropolitan District Council, Chief Regeneration Officer
Mike Ashworth, Wakefield Metropolitan District Council, Head of Development
Bob Foster, Wakefield Metropolitan District Council, Leisure Services
Steve Wiener, CEO, Cine UK Ltd
Peter Spawforth, Spawforth Planning Associates, Agents for Calder Island proposal

**Kettering Case Study**
Alan Cornock, Planning Policy and Enabling Manager, Kettering Borough Council
Ben Stacey, Assistant Planning Officer, Kettering Borough Council
Martin Hammond, Chief Executives Office, Kettering Borough Council
Celia Pinkney, Leisure Services Officer, Kettering Borough Council
David Newman, Structure Planning DC Officer, Northamptonshire County Council
Martin Gorman, Government Office for the East Midlands
Alan Rudge, Wilson Connolly
Brian Haddon, United Counties (bus operator)
Manager, Odeon Cinema
Manager, Frankie & Benny's Restaurant
Manager, Palace Cinema, Wellingborough
Manager, Castle Arts Centre, Wellingborough

**Bicester Case Study**
Stuart Yeatman, Principal Planning Officer, Cherwell District Council,
Wendy Riley, Richard Ellis, Principal Planner
Malcolm Hockaday, Planning Consultant, London & Metropolitan,
Alistair Crowdy, Partner, Planning Department, Healey & Baker.

**Ealing Case Study**
Dick Johns, Head of Planning Policy, London Borough of Ealing
Nicola Spalding, Planning Assistant, London Borough of Ealing
Aileen Jones, Central Ealing Area DC Manager, London Borough of Ealing
Paul Kettle, Senior Licensing Officer, London Borough of Ealing
John Delaney, Councillor, London Borough of Ealing, Chair, Ealing Town Centre Working Group
Christopher Jordan, Head of Legal Services (Deputy Clerk to the Justices), Ealing Magistrates
Court
Sgt David Evans, Licensing Sergeant, Metropolitan Police, Ealing
Corinne Templer, Ealing Civic Society
Michael Ray, Manager, Yates Wine Lodge

Sheffield Case Study
Mick Empsall, Department of Planning, Transport and Highways, Sheffield City Council
Peter Gait, Department of Planning, Transport and Highways, Sheffield City Council
Paul Skelton, Cultural Industries Quarter Team Leader, Chief Executives Department, Sheffield City Council
Paul Rogers, CEO, National Centre for Popular Music
Matt Conduit, Director, Workstation and Showcase Cinema
John Dearden, Dearden Associates, Butcher Works, Sheffield
Brown Street Bar
Truro Court Retail
Arundel Street Café Bar

STAGE 2

Tourism Focus Group
Michael Harrison, Rural Development, DETR
Jonathon Bore, Planning Inspectorate
Sean Bodkin, DETR (sponsorship of British Waterways and Inland Waterways Advisory Amenity Council)
Trevor Dawes, DCMS
David Court, Inland Waterways Amenity Advisory Council
Barry Goddard, Council for Travel and Tourism
Mike Kennedy, English Tourist Board
Nadia Little, Countryside Agency
Henry Little, Council for Protection of Rural England
John Ridgewell, British Holiday & Home Parks Association
Hugh Siegle, Managing Director, Whitbread Property
Brigid Simmonds, Business in Sport and Leisure
Chris Smith, Caravan Club
Mark Stretton, Forte Hotels

North West Regional Case Study
Tim Hill, Regional Planning Policy Co-ordinator, North West Regional Assembly
Steve Ashcroft, North West Development Agency
David Crease, Development Manager, North West Tourist Board
Ian Stephens, Development Manager, Cumbria Tourist Board
John Donnellon, Economic Development Officer, Blackpool Borough Council
John Nash, Countryside & Conservation Officer, Lake District National Park Authority
Norman Atkins, Area Planning Team Leader, Lake District National Park Authority
Ralph Howard, Assistant Director, Economy and Environment, Cumbria County Council

Cambridge Case Study
Brian Human, Assistant Director of Planning, Cambridge City Council
Margaret Badcock, Tourism Manager, Cambridge City Council
Lydia Bowman, City Centre Manager
Mark Vigor, Strategic Planning Manager, Cambridgeshire County Council
Guy Mills, Economic Development Officer, Cambridgeshire County Council
Keith Miles, Development Plans Officer, South Cambridge District Council
Neil Warren, Planning Officer, East of England Tourist Board

Cornwall Case Study
Hugh Siegle, Managing Director, Whitbread Property
Guy Parsons, Director of Marketing, Travel Inn
Managers, Carnon Downs and Penhale Travel Inns
Ian Robertson, Chief Planning Officer, Restormel District Council
Delwyn Matthews, Development Manager, West Country Tourist Board
Steven Booth & Dominic Houston, West Country Tourist Board
Deborah Smith, Cornwall Tourist Board
Paul Wright, Tourism Officer, Restormel Borough Council
Bob Morgan, Newquay Association of Tourism and Commerce
Sally McQuillen-Wright, Tourism Officer, Carrick District Council
Malcolm Brown, Cornwall County Council

Great Yarmouth Case Study
Edward Gilder, Planning Department, Great Yarmouth Borough Council
Phil Morris, Senior Planner, Norfolk County Council
Simon Wheatman, Planning Consultant, European Leisure Business Ltd
Len Gooch, Consultant, Paul Robinson Partnership
Ray Middleton, Planning Consultant, Middleton & George
James Spencer, British Holiday and Home Parks Association
Site owners/managers; Cherry Tree Holiday Park, Rose Farm, Liffens Caravan Park, Belle Aire Chalet Park

Fountains Abbey Case Study
Chris Bulmer, Ripon vintage bus operator
Paul Burgess, Countryside Officer, Harrogate Borough Council
Jamie Burles, Midland Mainline
Frank Crosby, Imperial War Museum at Duxford
Janet Edwards, Dunham Massey
Phil Grucock, Wiltshire County Council
Howard Handley, Chair, Yorkshire Dales Passenger Transport Users Group
John Hobby, Public Transport Co-ordinator, National Trust
Clive Hopkinson, Transport Planning and Development Manager, North Yorkshire County Council
Norman Hudson, Historic Houses Association
Bill Isherwood, North Yorkshire County Council
Geoff Lomax, Commercial Manager, Harrogate and District Travel
David Lote, Group Sales Manager, Longleat
Colin Speakman, Transport for Leisure
Alan Sutcliffe, National Trust member
Jane Whitehead, Public Affairs Officer, Fountains Abbey
Rachel Yorke, Transport and Planning Policy Officer, National Trust
Other consultees and groups contacted
Simon Leadbetter, Marylebone Warwick Balfour
Hugh Siegle, Managing Director, Whitbread Property
Tony Robinson, Director of Property, The Rank Group
Gary Dooley, Director of Development, Rank Leisure Division
John Henley, Managing Director, THI
Keith Wood and Michael Straw, Richard Ellis
Ian Mashiter, Property Investment Director, Norwich Union
Steve Wiener, CEO, Cine UK
Ian Riches, Warner Village Cinemas
Duncan Weir, UCI Cinemas
Richard Lambert, British Property Federation
Sarah Sayce, Leisure Property Forum
Bingo Association
British Hospitality Association
British Amusement and Catering Trade Association
British Entertainment and Discotheque Association
British Association of Leisure Parks, Piers and Attractions
British Casino Association
Town and Country Planning Association
Royal Institute of Chartered Surveyors
Institute of Leisure and Amenity Managers
Wildlife Trust
Regional Government Offices
Stephen Hodgson and Shaun Cove, Department of Culture, Media and Sport
Robert Chenery and Mark Balaam, London Tourist Board
Historic Houses Association
David Bays, Local Government Association
Jim Strike, London Planning Advisory Committee
Sophy Cushing, SUSTRANS

In addition, all LPAs in England were invited to raise issues in the context of the two LPA surveys. Similarly, over 100 leisure developer/operators and over 100 tourism developer/operators were invited to contribute via the two private sector surveys. (See Appendix IV).
Frequently Used Abbreviations

A3 A3 Use Class
AONB Area of Outstanding Natural Beauty
B&B Bed and breakfast accommodation
BTA British Tourist Authority
D2 D2 Use Class
DCMS Department of Culture Media and Sport
DETR Department of Environment, Transport and Regions
DoE Department of the Environment
EIP Examination in Public
EU European Union
ETB English Tourist Board (English Tourism Council)
FTJE Full - time job equivalent
GO Government Office (Regional)
LA Local Authority
LB London Borough
LPA Local Planning Authority
MAFF Ministry of Agriculture, Food and Fisheries
NP National Park
NPF National Planning Forum
Para Paragraph (No)
PPGs Planning Policy Guidance Notes
PPG6 Planning Policy Guidance Note 6: Town Centres and Retail Developments (Revised)
PPG13 Planning Policy Guidance Note 13: Transport
PPG21 Planning Policy Guidance Note 21: Tourism
RDA Regional Development Agency
RPB Regional Planning Body
RPGs Regional Planning Guidance Notes
RTB Regional Tourist Board
SoS Secretary of State, DETR
SPG Supplementary Planning Guidance
SSSI Site of Special Scientific Interest
TIA Traffic Impact Assessment
UCO Use Classes Order, 1987
UDP Unitary Development Plan
Figure A2.1: The relationship between leisure and tourism

**Leisure/recreation**
- Sport/physical recreation
- Other outdoor activities
- Community leisure
- Play and home-based leisure
- Entertainment

- Catering
- Visiting the arts

______________________________________________________
- Visiting our built heritage
- Visiting the countryside

**Tourism**
- Using overnight accommodation
- Visiting attractions
- Using conference/exhibition centres

Source: The Tourism Company
Figure 8.1: Proportion of applications in which main issues were raised

Source: LPA Survey
Figure 5.1: % of LPAs reporting problems with leisure development

- A lack of suitable sites
- A lack of resources
- Inadequate policies
- Traffic impact
- Difficulty of promoting sites
- Lack of interest by developers/operators
- None mentioned
Figure 4.1: Proportion of applications in which main issues were raised

Source: LPA Survey
Figure 2.2: New construction orders (1995 prices)

Source: DETR, GVA Grimley
Figure 2.1: Social factors shaping leisure trends in the UK

- Anxiety of 'Risk Society'
- No Longer 'Acting Your Age'
- Time Pressure
- Changing Work Patterns
- Increasing Leisure Choice
- New Technologies/Media
- Growth in 'Lifetime Learning'
- Demographic Change
- Feminisation of Society
- Changing Household Structures

Source: The Henley Centre
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>All domestic tourism</td>
<td>95</td>
<td>94</td>
<td>96</td>
<td>91</td>
<td>110</td>
<td>121</td>
<td>127</td>
<td>134</td>
<td>122</td>
</tr>
<tr>
<td>Short holidays</td>
<td>27</td>
<td>26</td>
<td>27</td>
<td>25</td>
<td>32</td>
<td>33</td>
<td>33</td>
<td>37</td>
<td>35</td>
</tr>
<tr>
<td>Long holidays</td>
<td>32</td>
<td>32</td>
<td>33</td>
<td>30</td>
<td>31</td>
<td>33</td>
<td>32</td>
<td>33</td>
<td>30</td>
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<tr>
<td>Business trips</td>
<td>12</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>13</td>
<td>15</td>
<td>16</td>
<td>15</td>
<td>14</td>
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<tr>
<td>Visits to friends &amp; relatives</td>
<td>20</td>
<td>21</td>
<td>21</td>
<td>22</td>
<td>30</td>
<td>35</td>
<td>40</td>
<td>41</td>
<td>38</td>
</tr>
<tr>
<td>Overseas visits</td>
<td>18</td>
<td>17</td>
<td>19</td>
<td>20</td>
<td>21</td>
<td>24</td>
<td>25</td>
<td>26</td>
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<tr>
<td>Day visits</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Comparable series data not available

Source: UKTS, IPS
### Table 11.1: Employment in UK tourism/leisure-related industries

<table>
<thead>
<tr>
<th>Sector</th>
<th>Total (000s)</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hotels and other tourist accommodation</td>
<td>313.5</td>
<td>18.1%</td>
</tr>
<tr>
<td>Libraries, museums and cultural activities</td>
<td>82.1</td>
<td>4.7%</td>
</tr>
<tr>
<td>Sports and other recreational activities</td>
<td>355.6</td>
<td>20.5%</td>
</tr>
<tr>
<td>Restaurants, cafes, bars, pubs and night-clubs</td>
<td>863.7</td>
<td>49.9%</td>
</tr>
<tr>
<td>Travel agencies and tour operators</td>
<td>116.1</td>
<td>6.7%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,731</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

Table A4.5: Response to tourism survey by type of authority

<table>
<thead>
<tr>
<th>Type of authority</th>
<th>Q’aires sent</th>
<th>No. Replies</th>
<th>% Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Councils</td>
<td>26</td>
<td>17</td>
<td>65</td>
</tr>
<tr>
<td>National Park Authorities*</td>
<td>9</td>
<td>5</td>
<td>56</td>
</tr>
<tr>
<td>District Councils</td>
<td>182</td>
<td>92</td>
<td>51</td>
</tr>
<tr>
<td>Metropolitan Boroughs</td>
<td>30</td>
<td>13</td>
<td>43</td>
</tr>
<tr>
<td>London Boroughs</td>
<td>20</td>
<td>12</td>
<td>60</td>
</tr>
<tr>
<td>Unitary Authorities</td>
<td>36</td>
<td>17</td>
<td>47</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>303</strong></td>
<td><strong>156</strong></td>
<td><strong>51</strong></td>
</tr>
</tbody>
</table>

* The New Forest Committee and the Broads Authority are included in this category.
Table A4.4: Responses to the tourism survey by region

<table>
<thead>
<tr>
<th>Region</th>
<th>Q’aires sent</th>
<th>No. Replies</th>
<th>% Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>London</td>
<td>20</td>
<td>12</td>
<td>60</td>
</tr>
<tr>
<td>East Anglia</td>
<td>13</td>
<td>9</td>
<td>69</td>
</tr>
<tr>
<td>Northern</td>
<td>22</td>
<td>10</td>
<td>45</td>
</tr>
<tr>
<td>East Midlands</td>
<td>34</td>
<td>23</td>
<td>68</td>
</tr>
<tr>
<td>South East</td>
<td>83</td>
<td>38</td>
<td>45</td>
</tr>
<tr>
<td>South West</td>
<td>44</td>
<td>21</td>
<td>48</td>
</tr>
<tr>
<td>West Midlands</td>
<td>35</td>
<td>23</td>
<td>66</td>
</tr>
<tr>
<td>Yorks and Humberside</td>
<td>16</td>
<td>5</td>
<td>31</td>
</tr>
<tr>
<td>North West</td>
<td>37</td>
<td>15</td>
<td>41</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>303</strong></td>
<td><strong>156</strong></td>
<td><strong>51</strong></td>
</tr>
</tbody>
</table>
### Table A4.3: Differences in response rates between rural and urban areas

<table>
<thead>
<tr>
<th>Type of area</th>
<th>No. Authorities</th>
<th>Responses</th>
<th>% Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rural/smaller towns</td>
<td>154</td>
<td>67</td>
<td>43</td>
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<tr>
<td>Larger towns and rural hinterland</td>
<td>75</td>
<td>39</td>
<td>52</td>
</tr>
<tr>
<td>Urban areas and cities</td>
<td>55</td>
<td>32</td>
<td>58</td>
</tr>
<tr>
<td>Metropolitan and London Boroughs</td>
<td>69</td>
<td>42</td>
<td>61</td>
</tr>
</tbody>
</table>
Table A4.2: Responses to 1998 leisure survey by type of authority

<table>
<thead>
<tr>
<th>Type of Authority</th>
<th>Q’aires sent</th>
<th>Responses</th>
<th>% Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>District/Unitary</td>
<td>286</td>
<td>138</td>
<td>48</td>
</tr>
<tr>
<td>Metropolitan Borough</td>
<td>36</td>
<td>19</td>
<td>53</td>
</tr>
<tr>
<td>London Borough</td>
<td>33</td>
<td>23</td>
<td>70</td>
</tr>
<tr>
<td>County</td>
<td>34</td>
<td>19</td>
<td>56</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>389</strong></td>
<td><strong>199</strong></td>
<td><strong>57</strong></td>
</tr>
</tbody>
</table>
### Table A4.1: Responses to 1998 leisure survey by region

<table>
<thead>
<tr>
<th>Region</th>
<th>Total</th>
<th>Q’aires sent</th>
<th>Responses</th>
<th>% Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>London</td>
<td></td>
<td>33</td>
<td>23</td>
<td>70</td>
</tr>
<tr>
<td>East Anglia</td>
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<td>18</td>
<td>58</td>
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<tr>
<td>Northern</td>
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<td>25</td>
<td>9</td>
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<tr>
<td>East Midlands</td>
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<td>37</td>
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<td>South East</td>
<td></td>
<td>105</td>
<td>56</td>
<td>53</td>
</tr>
<tr>
<td>South West</td>
<td></td>
<td>50</td>
<td>25</td>
<td>50</td>
</tr>
<tr>
<td>West Midlands</td>
<td></td>
<td>40</td>
<td>13</td>
<td>33</td>
</tr>
<tr>
<td>Yorks &amp; Humberside</td>
<td></td>
<td>22</td>
<td>15</td>
<td>68</td>
</tr>
<tr>
<td>North West</td>
<td></td>
<td>46</td>
<td>22</td>
<td>48</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>389</strong></td>
<td><strong>199</strong></td>
<td></td>
<td><strong>51</strong></td>
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</tbody>
</table>
Table A2.3: Leisure and tourism land uses for Stages 1 and 2 of the research

<table>
<thead>
<tr>
<th>Category</th>
<th>Land use</th>
<th>Leisure/tourism</th>
<th>Use Class</th>
<th>In/outdoor</th>
<th>Usual location</th>
<th>Site constraints</th>
</tr>
</thead>
<tbody>
<tr>
<td>Catering</td>
<td>Pub/bars</td>
<td>Leisure</td>
<td>A3</td>
<td>Indoor</td>
<td>All</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Fast food outlets</td>
<td>Leisure</td>
<td>A3</td>
<td>Indoor</td>
<td>All</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Restaurants</td>
<td>Leisure</td>
<td>A3</td>
<td>Indoor</td>
<td>All</td>
<td>No</td>
</tr>
<tr>
<td>Cultural recreation</td>
<td>Theatres</td>
<td>Leisure</td>
<td>Sui gen</td>
<td>Indoor</td>
<td>Town centre</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Concert halls</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Arts centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
<td>No</td>
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<tr>
<td>Indoor recreation</td>
<td>Ice rinks</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Laser games</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Amusement centres</td>
<td>Leisure</td>
<td>Sui gen</td>
<td>Indoor</td>
<td>Town centre</td>
<td>Amenity</td>
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<td>Indoor play centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
<td>No</td>
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<tr>
<td>Tenpin bowling centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
<td>No</td>
<td></td>
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<tr>
<td>Bingo centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
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<tr>
<td>Snooker centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
<td>No</td>
<td></td>
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<tr>
<td>Multiplexes</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Gyms/health &amp; fitness</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Equestrian centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Urban fringe, rural</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Arenas/exhibition centres</td>
<td>Leisure</td>
<td>D2/D1</td>
<td>Indoor</td>
<td>Town centre, urban</td>
<td>Scale</td>
<td></td>
</tr>
<tr>
<td>Sports/leisure centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
<td>No</td>
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</tr>
<tr>
<td>Swimming pools</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Snow centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Urban</td>
<td>Scale</td>
<td></td>
</tr>
<tr>
<td>Racquet centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Urban</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Stadia</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Urban</td>
<td>Scale</td>
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<tr>
<td>Cinemas</td>
<td>Leisure</td>
<td>D2</td>
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<td>Town centre</td>
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<td></td>
</tr>
<tr>
<td>Casinos</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Night-clubs</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
<td>No</td>
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</tr>
<tr>
<td>Visitor accom.</td>
<td>Conference centres</td>
<td>Tourism</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre</td>
<td>No</td>
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<tr>
<td></td>
<td>Touring caravan sites</td>
<td>Tourism</td>
<td>*</td>
<td>Outdoor</td>
<td>Rural</td>
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</tr>
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<td>Camp sites</td>
<td>Tourism</td>
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<td>Outdoor</td>
<td>Rural</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Holiday centres/statics</td>
<td>Tourism</td>
<td>Sui gen</td>
<td>Indoor</td>
<td>Rural</td>
<td>No</td>
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<tr>
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<td>C1</td>
<td>Indoor</td>
<td>Town centre</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Visitor attractions</td>
<td>Theme parks/wildlife</td>
<td>Tourism</td>
<td>D2</td>
<td>Outdoor</td>
<td>Rural</td>
<td>Scale</td>
</tr>
<tr>
<td></td>
<td>Gardens</td>
<td>Tourism</td>
<td>D2</td>
<td>Outdoor</td>
<td>Rural</td>
<td>Fixed site</td>
</tr>
<tr>
<td></td>
<td>Heritage sites</td>
<td>Tourism</td>
<td>D2</td>
<td>Indoor,</td>
<td>Town centre, rural</td>
<td>Fixed site</td>
</tr>
<tr>
<td></td>
<td>Museums/galleries</td>
<td>Tourism</td>
<td>D1</td>
<td>Indoor</td>
<td>Town centre</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Visitor centres</td>
<td>Tourism</td>
<td>D2</td>
<td>Indoor</td>
<td>All</td>
<td>Fixed site</td>
</tr>
</tbody>
</table>

Source: The Tourism Company

* = Dual control under T&CP Act 1990 and Caravan Sites & Control of Development Act 1960
## Table A2.2: All leisure and tourism land uses by category

<table>
<thead>
<tr>
<th>Category</th>
<th>Land use</th>
<th>Use Class</th>
<th>In/outdoor</th>
<th>Usual location</th>
<th>Site constraints</th>
</tr>
</thead>
<tbody>
<tr>
<td>Catering</td>
<td>Fast food outlets</td>
<td>Leisure</td>
<td>Indoor</td>
<td>All</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Restaurants</td>
<td>Leisure</td>
<td>Indoor</td>
<td>All</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Pub/bars</td>
<td>Leisure</td>
<td>Indoor</td>
<td>All</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Pub restaurants</td>
<td>Leisure</td>
<td>Indoor</td>
<td>All</td>
<td>No</td>
</tr>
<tr>
<td>Countryside rec.</td>
<td>Country parks</td>
<td>Leisure</td>
<td>D2</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Natural sites</td>
<td>Tourism</td>
<td>None</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Beaches</td>
<td>Tourism</td>
<td>None</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Lakes/rivers</td>
<td>Tourism</td>
<td>None</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Picnic sites</td>
<td>Tourism</td>
<td>D2</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Paths</td>
<td>Leisure</td>
<td>None</td>
<td>Outdoor</td>
<td>Urban, rural</td>
</tr>
<tr>
<td>Cultural recreation</td>
<td>Theatres</td>
<td>Leisure</td>
<td>Sui gen</td>
<td>Indoor</td>
<td>Town centre</td>
</tr>
<tr>
<td></td>
<td>Concert halls</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre</td>
</tr>
<tr>
<td>Indoor recreation</td>
<td>Racquet centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Urban</td>
</tr>
<tr>
<td></td>
<td>Swimming pools</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
</tr>
<tr>
<td></td>
<td>Indoor play centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
</tr>
<tr>
<td></td>
<td>Ice rinks</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
</tr>
<tr>
<td></td>
<td>Snooker centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
</tr>
<tr>
<td></td>
<td>Gyms/health &amp; fitness</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
</tr>
<tr>
<td></td>
<td>Equestrian centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Urban, rural</td>
</tr>
<tr>
<td></td>
<td>Laser games</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre</td>
</tr>
<tr>
<td></td>
<td>Sports/leisure centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
</tr>
<tr>
<td></td>
<td>Amusement centres</td>
<td>Leisure</td>
<td>Sui gen</td>
<td>Indoor</td>
<td>Town centre</td>
</tr>
<tr>
<td></td>
<td>Snow centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Urban</td>
</tr>
<tr>
<td></td>
<td>Stadia</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Urban</td>
</tr>
<tr>
<td></td>
<td>Arenas/exhibition centres</td>
<td>Leisure</td>
<td>D2/D1</td>
<td>Indoor</td>
<td>Town centre, urban</td>
</tr>
<tr>
<td></td>
<td>Casinos</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre</td>
</tr>
<tr>
<td></td>
<td>Night-clubs</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
</tr>
<tr>
<td></td>
<td>Tennis bowling centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
</tr>
<tr>
<td></td>
<td>Cinemas</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre</td>
</tr>
<tr>
<td></td>
<td>Multiplexes</td>
<td>Leisure</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, urban</td>
</tr>
<tr>
<td>Informal recreation</td>
<td>Urban parks</td>
<td>Leisure</td>
<td>D2</td>
<td>Outdoor</td>
<td>Town centre, urban</td>
</tr>
<tr>
<td></td>
<td>Play/amenity space</td>
<td>Leisure</td>
<td>D2</td>
<td>Outdoor</td>
<td>Urban</td>
</tr>
<tr>
<td>Outdoor recreation</td>
<td>Water sports centres</td>
<td>Leisure</td>
<td>D2</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Leisure airfields</td>
<td>Leisure</td>
<td>D2</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Motor sports centres</td>
<td>Leisure</td>
<td>Sui gen</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Outdoor shooting ranges</td>
<td>Leisure</td>
<td>Sui gen</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Bowling greens</td>
<td>Leisure</td>
<td>D2</td>
<td>Outdoor</td>
<td>Urban</td>
</tr>
<tr>
<td></td>
<td>Fishing lakes</td>
<td>Leisure</td>
<td>D2</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Golf courses</td>
<td>Leisure</td>
<td>D2</td>
<td>Outdoor</td>
<td>Rural, urban</td>
</tr>
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<td>Dry ski slopes</td>
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<td>D2</td>
<td>Outdoor</td>
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<td>Sports pitches</td>
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<td>D2</td>
<td>Outdoor</td>
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<td>Golf driving range</td>
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<td>D2</td>
<td>Outdoor</td>
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<td>War games</td>
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<td>Sui gen</td>
<td>Outdoor</td>
<td>Rural</td>
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<td>Conference centres</td>
<td>Tourism</td>
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<td>Indoor</td>
<td>Town centre</td>
</tr>
<tr>
<td></td>
<td>Touring caravan sites</td>
<td>Tourism</td>
<td>*</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Camp sites</td>
<td>Tourism</td>
<td>Unspecif</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Holiday centres/statics</td>
<td>Tourism</td>
<td>Sui gen</td>
<td>Indoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Hotels</td>
<td>Tourism</td>
<td>C1</td>
<td>Indoor</td>
<td>Town centre</td>
</tr>
<tr>
<td>Visitor attractions</td>
<td>Theme parks, wildlife</td>
<td>Tourism</td>
<td>D2</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Gardens</td>
<td>Tourism</td>
<td>D2</td>
<td>Outdoor</td>
<td>Rural</td>
</tr>
<tr>
<td></td>
<td>Heritage sites</td>
<td>Tourism</td>
<td>D2</td>
<td>Indoor,</td>
<td>Town centre, rural</td>
</tr>
<tr>
<td></td>
<td>Museums/galleries</td>
<td>Tourism</td>
<td>D1</td>
<td>Indoor</td>
<td>Town centre</td>
</tr>
<tr>
<td></td>
<td>Visitor centres</td>
<td>Tourism</td>
<td>D2</td>
<td>Indoor</td>
<td>Town centre, rural</td>
</tr>
</tbody>
</table>

Source: The Tourism Company

* Dual control under Town & Country Planning Act 1990 and Caravan Sites & Control of Development Act 1960
Table A2.1: A classification of leisure and tourism activities

<table>
<thead>
<tr>
<th>Activity</th>
<th>Facility</th>
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</thead>
<tbody>
<tr>
<td>Outdoor sport and recreation</td>
<td>Sports pitches/courts, golf courses, bowling greens, stadia, marinas, ski slopes, race tracks etc</td>
</tr>
<tr>
<td>Indoor sport and recreation</td>
<td>Swimming pools, sports halls, gymnasia, ice rinks, leisure centres etc</td>
</tr>
<tr>
<td>Outdoor informal recreation</td>
<td>Play spaces, parks, beaches, lakes, rivers</td>
</tr>
<tr>
<td>Countryside recreation</td>
<td>Country parks, national parks, picnic sites, trails/cycle paths etc</td>
</tr>
<tr>
<td>Cultural recreation</td>
<td>Theatres, concert halls, art centres/galleries, museums</td>
</tr>
<tr>
<td>Entertainment</td>
<td>Public halls, pavilions, cinemas, bowling, night-clubs etc</td>
</tr>
<tr>
<td>‘Domestic’ activity</td>
<td>Play centres, allotments, day centres, community halls etc</td>
</tr>
<tr>
<td>Gambling</td>
<td>Bingo halls, casinos</td>
</tr>
<tr>
<td>Social recreation</td>
<td>Pubs, restaurants, dance clubs</td>
</tr>
<tr>
<td>Spectating</td>
<td>Football, cricket, rugby, tennis, greyhound/ horse racing</td>
</tr>
<tr>
<td>Days out</td>
<td>Various destinations including formal attractions such as theme parks, heritage attractions etc</td>
</tr>
<tr>
<td>Tourism and holidays</td>
<td>Hotels, holiday camps, camp sites, caravan parks, conference centres etc</td>
</tr>
</tbody>
</table>

Source: The Tourism Company, derived from Torkildsen
Table 9.3: Problems encountered with planning policies or their application

<table>
<thead>
<tr>
<th></th>
<th>Often</th>
<th>Sometimes</th>
<th>Rarely</th>
</tr>
</thead>
<tbody>
<tr>
<td>AONB, Green Belt designations etc</td>
<td>16</td>
<td>7</td>
<td>5</td>
</tr>
<tr>
<td>Signposting</td>
<td>15</td>
<td>7</td>
<td>6</td>
</tr>
<tr>
<td>Countryside policies</td>
<td>14</td>
<td>10</td>
<td>5</td>
</tr>
<tr>
<td>Conditions on usage, seasonal occupancy etc</td>
<td>12</td>
<td>9</td>
<td>9</td>
</tr>
<tr>
<td>Planning obligations</td>
<td>10</td>
<td>14</td>
<td>4</td>
</tr>
<tr>
<td>Advertising control</td>
<td>9</td>
<td>6</td>
<td>9</td>
</tr>
<tr>
<td>Parking standards</td>
<td>9</td>
<td>7</td>
<td>8</td>
</tr>
<tr>
<td>Design issues in town centres</td>
<td>8</td>
<td>8</td>
<td>3</td>
</tr>
<tr>
<td>Building regulations</td>
<td>8</td>
<td>9</td>
<td>9</td>
</tr>
<tr>
<td>Residential amenity</td>
<td>7</td>
<td>8</td>
<td>7</td>
</tr>
<tr>
<td>Zoning in resorts</td>
<td>6</td>
<td>7</td>
<td>6</td>
</tr>
<tr>
<td>Licensing</td>
<td>5</td>
<td>7</td>
<td>10</td>
</tr>
<tr>
<td>Listed building consent</td>
<td>5</td>
<td>8</td>
<td>9</td>
</tr>
<tr>
<td>Use Classes Order</td>
<td>4</td>
<td>6</td>
<td>11</td>
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</table>

Source: Private Sector Survey
### Table 9.2: Main problems/issues with smaller tourism developments

<table>
<thead>
<tr>
<th>Issue</th>
<th>% of responding authorities</th>
<th>Locations in which issue most frequently mentioned</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pressure sensitive areas</td>
<td>31%</td>
<td>Rural (50%)</td>
</tr>
<tr>
<td>Residential amenity</td>
<td>27%</td>
<td>LBs (50%); Urban areas (40%)</td>
</tr>
<tr>
<td>Traffic</td>
<td>26%</td>
<td>LBs (58%); Rural (36%)</td>
</tr>
<tr>
<td>Design</td>
<td>10%</td>
<td>Urban areas (23%); Rural (21%)</td>
</tr>
<tr>
<td>Occupancy issues</td>
<td>10%</td>
<td>Small towns (17%); Rural (14%)</td>
</tr>
<tr>
<td>Signs</td>
<td>10%</td>
<td>Rural (14%); Small towns (13%)</td>
</tr>
<tr>
<td>Economic benefits</td>
<td>10%</td>
<td>LBs (25%)</td>
</tr>
<tr>
<td>Locational issues</td>
<td>10%</td>
<td>LBs (25%)</td>
</tr>
</tbody>
</table>

Source: LPA Survey
<table>
<thead>
<tr>
<th>Use</th>
<th>Develop. pressure</th>
<th>Types of area in which pressures mentioned most/least</th>
<th>Main planning issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hotels, Budget to 5 star</td>
<td>40%</td>
<td>Little variation between areas</td>
<td>Locational &amp; PPG6/13 issues</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Pressure on sensitive areas</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Traffic</td>
</tr>
<tr>
<td>B&amp;B/guest houses</td>
<td>20%</td>
<td>Little variation between areas</td>
<td>Traffic</td>
</tr>
<tr>
<td>Touring caravan sites</td>
<td>24%</td>
<td>Rural (31%) County Councils (35%) Cities/MBs/LBs (&lt;10%)</td>
<td>Pressure on sensitive areas</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Traffic</td>
</tr>
<tr>
<td>Static caravan sites</td>
<td>19%</td>
<td>Rural (24%) County Councils (35%) Cities/MBs/LBs (&lt;10%)</td>
<td>Pressure on sensitive areas</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Traffic</td>
</tr>
<tr>
<td>Campsites</td>
<td>11%</td>
<td>Rural (14%) County Councils (24%) Cities/MBs/LBs (&lt;10%)</td>
<td>Pressure on sensitive areas</td>
</tr>
<tr>
<td>Holiday parks, villages</td>
<td>11%</td>
<td>County Councils (29%) Cities/MBs/LBs (&lt;10%)</td>
<td>Pressure on sensitive areas</td>
</tr>
<tr>
<td>Other s/catering eg timeshare, hol. Flats</td>
<td>13%</td>
<td>Rural (21%) Cities/MBs (&lt;10%)</td>
<td>Pressure on sensitive areas</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Various</td>
</tr>
<tr>
<td>Conference/ exhibition centres</td>
<td>15%</td>
<td>Urban/Cities (23%) Met. Boroughs (29%) Rural (&lt;10%)</td>
<td>Pressure on sensitive areas</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Economic benefits</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Traffic</td>
</tr>
<tr>
<td>Theme parks and other attractions</td>
<td>14%</td>
<td>Met. Boroughs (29%) County Councils (29%) Rural/Towns (&lt;10%)</td>
<td>Various</td>
</tr>
<tr>
<td>Museums and galleries</td>
<td>12%</td>
<td>Larger towns (20%) Urban/Cities (18%) Rural/LBs (&lt;10%)</td>
<td>Economic benefits</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Design/conservation</td>
</tr>
<tr>
<td>Historic building/ gardens</td>
<td>17%</td>
<td>Urban/Cities (23%) Towns (&lt;10%)</td>
<td>Design/conservation</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Pressure on sensitive areas</td>
</tr>
<tr>
<td>Heritage sites</td>
<td>16%</td>
<td>London Boroughs (25%) Rural (&lt;10%)</td>
<td>Traffic issues</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Pressure on sensitive areas</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Design/conservation</td>
</tr>
<tr>
<td>Visitor centres</td>
<td>21%</td>
<td>Met Boroughs(43%) Counties (35%)</td>
<td>Traffic issues</td>
</tr>
<tr>
<td>Marinas</td>
<td>15%</td>
<td>Rural (21%) Counties (29%)</td>
<td>Pressure on sensitive areas</td>
</tr>
<tr>
<td>Waterway/boats</td>
<td>17%</td>
<td>Counties (36%)</td>
<td>Pressure on sensitive areas</td>
</tr>
<tr>
<td>Other</td>
<td>6%</td>
<td></td>
<td>Various</td>
</tr>
</tbody>
</table>

Source: LPA Survey
### Table 8.5: Planning issues in tourism appeals

<table>
<thead>
<tr>
<th></th>
<th>Pressure on designated areas</th>
<th>Traffic and parking (1)</th>
<th>Tourism need/diversification</th>
<th>Residential amenity</th>
<th>Other issues (2)</th>
<th>TOTAL Appeals</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Hotels</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allowed</td>
<td>29</td>
<td>13</td>
<td>2</td>
<td>15</td>
<td>0</td>
<td>36</td>
</tr>
<tr>
<td>Dismissed</td>
<td>47</td>
<td>21</td>
<td>16</td>
<td>14</td>
<td>11</td>
<td>65</td>
</tr>
<tr>
<td><strong>Attractions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allowed</td>
<td>8</td>
<td>3</td>
<td>1</td>
<td>3</td>
<td>3</td>
<td>12</td>
</tr>
<tr>
<td>Dismissed</td>
<td>7</td>
<td>3</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>10</td>
</tr>
<tr>
<td><strong>Caravans</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allowed</td>
<td>7</td>
<td>2</td>
<td>2</td>
<td>1</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td>Dismissed</td>
<td>22</td>
<td>2</td>
<td>13</td>
<td>5</td>
<td>3</td>
<td>26</td>
</tr>
<tr>
<td><strong>Other holiday accommodation</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Allowed</td>
<td>24</td>
<td>6</td>
<td>1</td>
<td>2</td>
<td>0</td>
<td>24</td>
</tr>
<tr>
<td>Dismissed</td>
<td>25</td>
<td>6</td>
<td>5</td>
<td>5</td>
<td>5</td>
<td>29</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>174</td>
<td>56</td>
<td>43</td>
<td>46</td>
<td>25</td>
<td>217</td>
</tr>
</tbody>
</table>

Note 1: Includes highway safety. Note 2: Includes loss of residential, needs of a business, social benefit etc.
<table>
<thead>
<tr>
<th>Category</th>
<th>Allowed (%)</th>
<th>Dismissed (%)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hotels</td>
<td>36 (36)</td>
<td>65 (64)</td>
<td>101</td>
</tr>
<tr>
<td>Attractions</td>
<td>12 (55)</td>
<td>10 (45)</td>
<td>22</td>
</tr>
<tr>
<td>Caravans/tents</td>
<td>10 (28)</td>
<td>26 (72)</td>
<td>36</td>
</tr>
<tr>
<td>Holiday dwellings</td>
<td>24 (45)</td>
<td>29 (55)</td>
<td>53</td>
</tr>
<tr>
<td>Marinas</td>
<td>2 (40)</td>
<td>3 (60)</td>
<td>5</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>84 (39)</strong></td>
<td><strong>133 (61)</strong></td>
<td><strong>217</strong></td>
</tr>
</tbody>
</table>

Source: Compass
<table>
<thead>
<tr>
<th>Location</th>
<th>LPA decision</th>
<th>Appeal decision</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Granted</td>
<td>Refused</td>
</tr>
<tr>
<td>Town centre</td>
<td>19</td>
<td>1</td>
</tr>
<tr>
<td>Edge of centre</td>
<td>22</td>
<td>1</td>
</tr>
<tr>
<td>Out-of-centre</td>
<td>16</td>
<td>1</td>
</tr>
<tr>
<td>District/village</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Open countryside</td>
<td>28</td>
<td>11</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>86</strong></td>
<td><strong>16</strong></td>
</tr>
</tbody>
</table>

Source: LPA Survey

*Total includes one appeal against non-determination
<table>
<thead>
<tr>
<th>Use</th>
<th>Town centre</th>
<th>Edge-of-centre</th>
<th>Out-of-centre</th>
<th>District/village centre</th>
<th>Open countryside</th>
<th>Other</th>
<th>Total cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hotel</td>
<td>11</td>
<td>18</td>
<td>21</td>
<td>3</td>
<td>27</td>
<td>0</td>
<td>80</td>
</tr>
<tr>
<td>Touring caravan site</td>
<td>0</td>
<td>2</td>
<td>0</td>
<td>2</td>
<td>9</td>
<td>0</td>
<td>13</td>
</tr>
<tr>
<td>Static caravan site</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>8</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td>Camp site</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>3</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td>Holiday park/village</td>
<td>2</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>5</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td>Conference centre</td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>8</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td>Theme park/attractions</td>
<td>2</td>
<td>4</td>
<td>2</td>
<td>1</td>
<td>8</td>
<td>0</td>
<td>17</td>
</tr>
<tr>
<td>Museums/galleries</td>
<td>7</td>
<td>3</td>
<td>3</td>
<td>0</td>
<td>3</td>
<td>0</td>
<td>16</td>
</tr>
<tr>
<td>Heritage sites</td>
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<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Visitor centre</td>
<td>4</td>
<td>1</td>
<td>3</td>
<td>0</td>
<td>7</td>
<td>0</td>
<td>15</td>
</tr>
<tr>
<td>Marinas</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>4</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>Waterway/boats</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Other leisure</td>
<td>4</td>
<td>6</td>
<td>5</td>
<td>0</td>
<td>7</td>
<td>0</td>
<td>22</td>
</tr>
<tr>
<td>A3</td>
<td>5</td>
<td>7</td>
<td>8</td>
<td>0</td>
<td>11</td>
<td>0</td>
<td>31</td>
</tr>
<tr>
<td>Retail</td>
<td>5</td>
<td>4</td>
<td>2</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>12</td>
</tr>
<tr>
<td>Housing</td>
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<td>2</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>7</td>
</tr>
<tr>
<td>Other</td>
<td>1</td>
<td>6</td>
<td>5</td>
<td>0</td>
<td>12</td>
<td>1</td>
<td>25</td>
</tr>
<tr>
<td><strong>Total cases</strong></td>
<td><strong>27</strong></td>
<td><strong>31</strong></td>
<td><strong>30</strong></td>
<td><strong>7</strong></td>
<td><strong>65</strong></td>
<td><strong>1</strong></td>
<td><strong>161</strong></td>
</tr>
</tbody>
</table>

Source: LPA Survey
Note 1: The definitions of different locations are sometimes a matter of dispute, as the survey results and the appeals analysis indicate. The locations are those given by the LPAs and may not be based on the same definitions.
<table>
<thead>
<tr>
<th>Developments</th>
<th>No. of cases</th>
<th>LPA refusals</th>
<th>LPA approvals</th>
<th>Subject to appeal-LPA decision unknown</th>
<th>Pending etc</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hotels (some including A3)</td>
<td>51</td>
<td>6</td>
<td>26</td>
<td>2</td>
<td>17</td>
</tr>
<tr>
<td>+ conference centre</td>
<td>5</td>
<td>1</td>
<td>1</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>+ attraction/museum</td>
<td>5</td>
<td>-</td>
<td>1</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>+ caravan/camp site</td>
<td>5</td>
<td>-</td>
<td>2</td>
<td>-</td>
<td>3</td>
</tr>
<tr>
<td>+ other tourism use</td>
<td>6</td>
<td>-</td>
<td>5</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>+ non-tourism use</td>
<td>7</td>
<td>1</td>
<td>3</td>
<td>-</td>
<td>3</td>
</tr>
<tr>
<td>Touring caravan (+camp) site</td>
<td>5</td>
<td>1</td>
<td>3</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>+ other tourism use</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Static caravan (+camp) site</td>
<td>4</td>
<td>1</td>
<td>2</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>+ other tourism use</td>
<td>1</td>
<td>-</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Touring +static caravan site</td>
<td>3</td>
<td>-</td>
<td>-</td>
<td>3</td>
<td>-</td>
</tr>
<tr>
<td>Holiday park</td>
<td>5</td>
<td>-</td>
<td>4</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>Conference centre</td>
<td>2</td>
<td>-</td>
<td>1</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>+ other tourism use</td>
<td>2</td>
<td>1</td>
<td>-</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Attraction</td>
<td>11</td>
<td>3</td>
<td>8</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>+ other tourism use</td>
<td>1</td>
<td>-</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>+ other use</td>
<td>1</td>
<td>-</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Museum/gallery</td>
<td>7</td>
<td>1</td>
<td>5</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>+ other tourism use</td>
<td>2</td>
<td>-</td>
<td>2</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>+ other uses</td>
<td>4</td>
<td>-</td>
<td>4</td>
<td>-</td>
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<tr>
<td>Visitor centre</td>
<td>9</td>
<td>-</td>
<td>6</td>
<td>-</td>
<td>3</td>
</tr>
<tr>
<td>Marinas/boats/waterway</td>
<td>4</td>
<td>-</td>
<td>3</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>Mixed and other</td>
<td>18</td>
<td>-</td>
<td>5</td>
<td>2</td>
<td>11</td>
</tr>
<tr>
<td>Total</td>
<td>161</td>
<td>16</td>
<td>86</td>
<td>8</td>
<td>51</td>
</tr>
</tbody>
</table>

Source: LPA Survey
### Table 7.6: Site allocations

<table>
<thead>
<tr>
<th>Nature of allocation</th>
<th>Allocation in Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>For hotels</td>
<td>43%</td>
</tr>
<tr>
<td>For camping/caravan sites</td>
<td>15%</td>
</tr>
<tr>
<td>For attractions</td>
<td>25%</td>
</tr>
<tr>
<td>For another single tourism use</td>
<td>15%</td>
</tr>
<tr>
<td>For a mixture of tourism uses</td>
<td>21%</td>
</tr>
<tr>
<td>Tourism uses part of mixed-use site</td>
<td>36%</td>
</tr>
</tbody>
</table>

Source: LPA Survey
<table>
<thead>
<tr>
<th>Policies</th>
<th>In adopted and/or emerging plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policies for hotels and/or B&amp;Bs</td>
<td>72%</td>
</tr>
<tr>
<td>Policies for conference facilities</td>
<td>25%</td>
</tr>
<tr>
<td>Policies for campsites/touring caravan sites</td>
<td>65%</td>
</tr>
<tr>
<td>Policies for other self-catering establishments eg statics, flats</td>
<td>47%</td>
</tr>
<tr>
<td>Policies for attractions, marinas etc</td>
<td>49%</td>
</tr>
</tbody>
</table>

Source: LPA Survey
### Table 7.4: General policies for tourism

<table>
<thead>
<tr>
<th>Policies</th>
<th>In adopted and/or emerging plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>General policies relating to tourism development</td>
<td>85%</td>
</tr>
<tr>
<td>Policies referring to the evening/24 hour economy</td>
<td>13%</td>
</tr>
<tr>
<td>Policies requiring community benefits</td>
<td>31%</td>
</tr>
<tr>
<td>Policies protecting any of the defined tourism uses</td>
<td>30%</td>
</tr>
<tr>
<td>Policies discouraging tourism uses in particular areas</td>
<td>39%</td>
</tr>
<tr>
<td>Policies referring to occupancy conditions</td>
<td>24%</td>
</tr>
<tr>
<td>Other policies</td>
<td>12%</td>
</tr>
</tbody>
</table>

Source: LPA Survey
Table 7.3: Traffic and transport policies

<table>
<thead>
<tr>
<th>Policies</th>
<th>In adopted and/or emerging plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policies referring to traffic/transport impact</td>
<td>58%</td>
</tr>
<tr>
<td>Policies referring to public transport accessibility</td>
<td>48%</td>
</tr>
<tr>
<td>Policies referring to accessibility by other non-car modes of transport</td>
<td>44%</td>
</tr>
</tbody>
</table>

Source: LPA Survey
Table 7.2: Strategies and policies for tourism

<table>
<thead>
<tr>
<th>Strategies and Policies</th>
<th>In adopted and/or emerging plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>A general locational strategy for tourism eg favouring particular areas</td>
<td>63%</td>
</tr>
<tr>
<td>General policies relating to tourism development</td>
<td>85%</td>
</tr>
<tr>
<td>Policies referring to the sequential approach</td>
<td>23%</td>
</tr>
</tbody>
</table>

Source: LPA Survey
<table>
<thead>
<tr>
<th>Study</th>
<th>Adopted Plan</th>
<th>Emerging Plan</th>
<th>Either Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Survey of existing facilities</td>
<td>18%</td>
<td>20%</td>
<td>33%</td>
</tr>
<tr>
<td>Market demand/needs study</td>
<td>6%</td>
<td>14%</td>
<td>17%</td>
</tr>
<tr>
<td>Liaison with the industry</td>
<td>10%</td>
<td>16%</td>
<td>20%</td>
</tr>
<tr>
<td>Consultation with operators/developers</td>
<td>17%</td>
<td>19%</td>
<td>28%</td>
</tr>
<tr>
<td>Identification of suitable sites/site search</td>
<td>13%</td>
<td>19%</td>
<td>25%</td>
</tr>
<tr>
<td>Research into the planning effects</td>
<td>3%</td>
<td>7%</td>
<td>7%</td>
</tr>
<tr>
<td>Other</td>
<td>3%</td>
<td>4%</td>
<td>4%</td>
</tr>
</tbody>
</table>

Source: LPA Survey
## Table 4.6: Appeals determined by the Secretary of State

<table>
<thead>
<tr>
<th>Category</th>
<th>Called in cases</th>
<th>Recovered cases</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No.</td>
<td>Cases where SoS reversed Inspector’s recommendation</td>
</tr>
<tr>
<td>Leisure parks</td>
<td>7</td>
<td>2</td>
</tr>
<tr>
<td>Drive-through restaurants</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Indoor sport</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Mixed leisure + other</td>
<td>8</td>
<td>1</td>
</tr>
<tr>
<td>Stadia</td>
<td>7</td>
<td>1</td>
</tr>
<tr>
<td>Pubs + restaurants</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Marinas</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Single leisure use</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>27</td>
<td><strong>4</strong></td>
</tr>
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</table>

Source: Compass
<table>
<thead>
<tr>
<th>Category</th>
<th>No.</th>
<th>Access/ location</th>
<th>Traffic Impact/safety</th>
<th>Vitality &amp; viability</th>
<th>Sequential approach/need</th>
<th>Character of area /design</th>
<th>Residential amenity</th>
<th>Open space/ Green belt</th>
<th>Regeneration/ employment</th>
<th>Relationship with plan</th>
<th>Other</th>
</tr>
</thead>
<tbody>
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<td>16</td>
<td>9</td>
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<td>2</td>
<td>0</td>
<td>5</td>
<td>10</td>
<td>6</td>
</tr>
<tr>
<td>Drive-through restaurants</td>
<td>15</td>
<td>8</td>
<td>6</td>
<td>3</td>
<td>0</td>
<td>4</td>
<td>10</td>
<td>1</td>
<td>2</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>Indoor sport</td>
<td>13</td>
<td>2</td>
<td>3</td>
<td>2</td>
<td>2</td>
<td>7</td>
<td>6</td>
<td>5</td>
<td>1</td>
<td>3</td>
<td>8</td>
</tr>
<tr>
<td>Mixed leisure + other</td>
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<td>6</td>
<td>2</td>
<td>4</td>
<td>6</td>
<td>1</td>
<td>2</td>
<td>0</td>
<td>2</td>
<td>6</td>
<td>4</td>
</tr>
<tr>
<td>Studia</td>
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<td>2</td>
<td>5</td>
<td>1</td>
<td>2</td>
<td>4</td>
<td>5</td>
<td>4</td>
<td>2</td>
<td>3</td>
<td>5</td>
</tr>
<tr>
<td>Pubs + restaurants</td>
<td>7</td>
<td>2</td>
<td>4</td>
<td>4</td>
<td>2</td>
<td>4</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Marinas</td>
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<td>0</td>
<td>0</td>
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<td>0</td>
<td>2</td>
<td>1</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Single leisure use</td>
<td>4</td>
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<td>1</td>
<td>0</td>
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<td>2</td>
<td>1</td>
<td>1</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
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<td>29</td>
<td>22</td>
<td>22</td>
<td>33</td>
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<td>14</td>
<td>15</td>
<td>33</td>
<td>32</td>
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</tbody>
</table>

Source: Derived from decision letters
Table 4.4: Appeals allowed and dismissed by main use

<table>
<thead>
<tr>
<th>Category</th>
<th>No of appeals (%)</th>
<th>Allowed (%)</th>
<th>Dismissed (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leisure parks</td>
<td>16 (21%)</td>
<td>6 (38%)</td>
<td>10 (63%)</td>
</tr>
<tr>
<td>Drive-through restaurants</td>
<td>15 (20%)</td>
<td>13 (87%)</td>
<td>2 (13%)</td>
</tr>
<tr>
<td>Indoor sport</td>
<td>13 (17%)</td>
<td>6 (46%)</td>
<td>7 (54%)</td>
</tr>
<tr>
<td>Mixed leisure + other</td>
<td>8 (11%)</td>
<td>1 (13%)</td>
<td>7 (88%)</td>
</tr>
<tr>
<td>Stadia</td>
<td>8 (11%)</td>
<td>6 (75%)</td>
<td>2 (25%)</td>
</tr>
<tr>
<td>Pubs + restaurants</td>
<td>7 (9%)</td>
<td>4 (57%)</td>
<td>3 (43%)</td>
</tr>
<tr>
<td>Marinas</td>
<td>5 (7%)</td>
<td>2 (40%)</td>
<td>3 (60%)</td>
</tr>
<tr>
<td>Single leisure use</td>
<td>4 (5%)</td>
<td>3 (75%)</td>
<td>1 (25%)</td>
</tr>
<tr>
<td>TOTAL</td>
<td>76 (100%)</td>
<td>41 (54%)</td>
<td>35 (46%)</td>
</tr>
</tbody>
</table>

Source: Compass
<table>
<thead>
<tr>
<th>Location</th>
<th>Granted (%)</th>
<th>Refused</th>
<th>Appeals Non-determined</th>
<th>Pending</th>
<th>Called-in</th>
<th>Withdrown</th>
<th>Referred</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Town Centre</td>
<td>48 (94%)</td>
<td>3</td>
<td>2</td>
<td>21</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>76</td>
</tr>
<tr>
<td>Edge-of-Ctre</td>
<td>29 (94%)</td>
<td>2</td>
<td>1</td>
<td>13</td>
<td>1</td>
<td>3</td>
<td>0</td>
<td>49</td>
</tr>
<tr>
<td>Out-of-centre</td>
<td>21 (66%)</td>
<td>11</td>
<td>0</td>
<td>14</td>
<td>7</td>
<td>3</td>
<td>2</td>
<td>58</td>
</tr>
<tr>
<td>Out-of-town</td>
<td>12 (75%)</td>
<td>4</td>
<td>1</td>
<td>5</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>24</td>
</tr>
<tr>
<td>District Ctre</td>
<td>1 (100%)</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td>Unknown</td>
<td>3 (100%)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>114 (85%)</strong></td>
<td><strong>20</strong></td>
<td><strong>4</strong></td>
<td><strong>55</strong></td>
<td><strong>9</strong></td>
<td><strong>7</strong></td>
<td><strong>4</strong></td>
<td><strong>213</strong></td>
</tr>
</tbody>
</table>

Source: LPA Survey
### Table 4.2: Uses included in the examples of applications 1996-1998

<table>
<thead>
<tr>
<th>Use</th>
<th>Town Centre</th>
<th>Edge-of-centre</th>
<th>Out-of-centre</th>
<th>Out-of-town</th>
<th>Total</th>
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</thead>
<tbody>
<tr>
<td>A3</td>
<td>46</td>
<td>37</td>
<td>39</td>
<td>14</td>
<td>136</td>
</tr>
<tr>
<td>Multiplex (Retail)</td>
<td>42</td>
<td>32</td>
<td>25</td>
<td>9</td>
<td>108</td>
</tr>
<tr>
<td>Leisure/sport centre/pool</td>
<td>15</td>
<td>11</td>
<td>9</td>
<td>1</td>
<td>36</td>
</tr>
<tr>
<td>10 pin bowling</td>
<td>10</td>
<td>11</td>
<td>9</td>
<td>3</td>
<td>33</td>
</tr>
<tr>
<td>Health/fitness</td>
<td>7</td>
<td>10</td>
<td>9</td>
<td>3</td>
<td>29</td>
</tr>
<tr>
<td>DJ/2 – unspecified</td>
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<td>7</td>
<td>8</td>
<td>4</td>
<td>27</td>
</tr>
<tr>
<td>Night-club</td>
<td>14</td>
<td>4</td>
<td>6</td>
<td>2</td>
<td>26</td>
</tr>
<tr>
<td>Bingo</td>
<td>6</td>
<td>7</td>
<td>5</td>
<td>1</td>
<td>19</td>
</tr>
<tr>
<td>Family entertainment centre</td>
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<td>4</td>
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<td>19</td>
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<td>Football stadium</td>
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<td>4</td>
<td>7</td>
</tr>
<tr>
<td>Arena</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>76</strong></td>
<td><strong>49</strong></td>
<td><strong>58</strong></td>
<td><strong>24</strong></td>
<td><strong>213</strong></td>
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</table>

Source: LPA Survey
<table>
<thead>
<tr>
<th>Developments</th>
<th>Town Centre</th>
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<th>Out-of-centre</th>
<th>Out-of-town</th>
<th>District</th>
<th>Unknown</th>
<th>Total</th>
</tr>
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<tbody>
<tr>
<td>Mixed leisure incl. multiplex</td>
<td>22</td>
<td>19</td>
<td>10</td>
<td>3</td>
<td>1</td>
<td>0</td>
<td>55</td>
</tr>
<tr>
<td>Multiplex</td>
<td>15</td>
<td>8</td>
<td>9</td>
<td>5</td>
<td>0</td>
<td>0</td>
<td>37</td>
</tr>
<tr>
<td>Leisure centre/pool +/- Health</td>
<td>3</td>
<td>6</td>
<td>9</td>
<td>3</td>
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<td>1</td>
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<td>25</td>
</tr>
<tr>
<td>Multiplex with retail</td>
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<td>2</td>
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<td>0</td>
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</tr>
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<td>Health</td>
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<td>3</td>
<td>2</td>
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<td>0</td>
<td>8</td>
</tr>
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<td>1</td>
<td>0</td>
<td>0</td>
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<tr>
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<td>4</td>
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<td>0</td>
<td>7</td>
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<td>0</td>
<td>7</td>
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<tr>
<td>Multiplex + sport</td>
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<td>2</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>Bingo</td>
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<td>3</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>A3 + A1</td>
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<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>10 pin bowling</td>
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<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Arena</td>
<td>0</td>
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<td>4</td>
</tr>
<tr>
<td>Night-club</td>
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<td>0</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>3</td>
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<td>2</td>
</tr>
<tr>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>76</strong></td>
<td><strong>49</strong></td>
<td><strong>58</strong></td>
<td><strong>24</strong></td>
<td><strong>3</strong></td>
<td><strong>3</strong></td>
<td><strong>213</strong></td>
</tr>
</tbody>
</table>

Source: LPA Survey

Note 1: The definitions of different locations are sometimes a matter of dispute, as the survey results and the appeals analysis indicate. The locations of developments are those given by the LPAs and may not be based on the same definitions.
Table 2.2: Annual growth of the budget hotel sector in the UK

<table>
<thead>
<tr>
<th>Year</th>
<th>Hotels</th>
<th>Rooms</th>
</tr>
</thead>
<tbody>
<tr>
<td>1992</td>
<td>200</td>
<td>8,442</td>
</tr>
<tr>
<td>1993</td>
<td>222</td>
<td>9,364</td>
</tr>
<tr>
<td>1994</td>
<td>264</td>
<td>11,389</td>
</tr>
<tr>
<td>1995</td>
<td>322</td>
<td>14,224</td>
</tr>
<tr>
<td>1996</td>
<td>400</td>
<td>18,155</td>
</tr>
<tr>
<td>1997</td>
<td>484</td>
<td>23,002</td>
</tr>
<tr>
<td>1998</td>
<td>554</td>
<td>27,447</td>
</tr>
<tr>
<td>2003 (forecast)</td>
<td>1,169</td>
<td>71,600</td>
</tr>
</tbody>
</table>

Source: UK Budget Hotel Survey, Deloitte & Touche, 1999
Table A4.6: Differences in response rates between rural and urban areas

<table>
<thead>
<tr>
<th>Type of area</th>
<th>No. Authorities</th>
<th>No. Replies</th>
<th>% Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rural/smaller towns</td>
<td>131</td>
<td>58</td>
<td>48</td>
</tr>
<tr>
<td>Larger towns and rural hinterland</td>
<td>57</td>
<td>28</td>
<td>49</td>
</tr>
<tr>
<td>Urban areas and cities</td>
<td>43</td>
<td>21</td>
<td>49</td>
</tr>
<tr>
<td>Metropolitan and London Boroughs</td>
<td>50</td>
<td>26</td>
<td>52</td>
</tr>
</tbody>
</table>