

TOURISM

6.23. LOCAL PLAN OBJECTIVES

Objection to Fourth Objective

727	Environment Agency-South West Region
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Conditionally withdrawn objection

122	Council for the Protection of Rural England
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Supporter of First Objective

79	Exmoor National Park Authority
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Supporter of the objectives generally

17	West Country Tourist Board
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Inspector's note

Objection 122 is conditionally withdrawn.

Issue

Whether it should be an Objective of the Plan to control caravan and camping sites along the whole of the coast within the Plan area.

Inspector's reasoning and conclusions

I find the wording of the 4th Local Plan Objective ambiguous in that it is not clear whether 'outside' means 'adjacent to' or 'away from'. I have considerable sympathy with the objectors in this matter. In view of the pressures on the coast of the District I consider that this Local Plan Objective for tourism should apply to the whole of the area between the Coastal Zone boundary (Policy CO/2) and the coast itself.

6.23.1. RECOMMENDATION

I recommend that the 4th Local Plan Objective for tourism be modified by the deletion of 'outside Minehead and Watchet' and the insertion of 'in the Coastal Zone'.

6.24. PARA. 6.4.10 AND CHANGE NO 129

Conditionally withdrawn objection

728	Environment Agency-South West Region
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Objection to PC129

2089	Hon R T Lytton
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Inspector's note

Objection 728 is conditionally withdrawn in response to the inclusion of fishing in PC129.

Issue

Whether the proposed change should be modified by a more inclusive terminology embracing sports generally.

Inspector's reasoning and conclusions

Objection 2089 cites motor sports, shooting, and hang-gliding as omissions from PC129. However, I accept that its wording is not intended to be comprehensive and that any proposed development concerning such relatively informal sports will fall to be examined on its merits in planning terms. Such matters are further dealt with in paragraph 8.2.30 of the Plan. While in my view that and the proposed additional Policy R/10 (PC229), read together with PC129, largely satisfy this objection I nevertheless consider that in the interest of comprehensiveness 'and open air sports appropriate to West Somerset landscapes' should be inserted after 'recreational pursuits' in PC129.

6.24.1. RECOMMENDATION

I recommend that the Plan be modified by PC129 subject to the insertion of 'and open air sports appropriate to West Somerset landscapes' after 'recreational pursuits'.

6.25. POLICY TO/1 & CHANGE NO 130

Objections

20	West Country Tourist Board
666	Mrs T Jones
729	Environment Agency -South West Region

Objections conditionally withdrawn

123	Council for the Protection of Rural England
820	Government Office for the South West
950	Somerset County Council
1071	Hon R T Lytton

Supporter

499	Rural Development Commission
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Supporter of PC130

2455	Council for the Protection of Rural England
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Inspector's note

Objection 1071 was withdrawn in the inquiry conditional upon the adoption of PC12 (additional paragraph after paragraph 3.14 of the Plan). Objections 123, 820, and 950 are conditionally withdrawn in response to criteria (ii), (v), and (vi) of PC130.

Issues

- (i) Whether, in the interests of business viability and maintaining rural employment opportunities in the designated villages, the Policy should explicitly recognise the development and improvement opportunities for sustainable tourism development, including hotels, in localities other than Minehead and Watchet.
- (ii) Whether criterion (iii) of the Policy provides sufficient protection for the environment.

Inspector's reasoning and conclusions

Issue (i)

I recognise the potential contribution that tourism can make to the viability of businesses and availability of employment in the rural parts of the Plan area. Tourism development in the designated villages is encouraged under criterion (iv) of the Policy. However, bearing also in mind the scope for specific forms of tourism development in the countryside generally in Policies TO/5 and TO/6 I do not consider any further change necessary. The amendment of criterion (ii) and insertion of criteria (v) and (vi) by PC130 satisfactorily add reference to the environment of proposed tourism-related developments and their accessibility.

Issue (ii)

I am of the view that criterion (iii) of the Policy, together with the commentary on sustainable tourism in paragraphs 6.4.13 and 6.4.14 of the Plan, provides sufficient safeguard against harm which tourism development might otherwise cause to the natural environment and built heritage of the Plan area.

6.25.1. RECOMMENDATION

I recommend that the Plan be modified by PC130.

6.26. PARA. 6.4.22

Objection

576	Blue Anchor Conservation Society
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Issue

Whether reference should be made to Minehead Pier Project in view of the absence of funding or the likelihood of profitable implementation.

Inspector's reasoning and conclusions

Although funding to construct a purpose built pier at Minehead has not currently been secured sea transport links including the enhancement of ferry services across the Bristol Channel are recognised in paragraph 11.3.2 of the Somerset Local Transport Plan and the *West Somerset Economic Development and Access Strategy*. I support the LPA's suggested revision of the text of this paragraph to reflect the current situation more accurately.

6.26.1. RECOMMENDATION

I recommend that paragraph 6.4.22 be modified as follows:

Other outstanding initiatives include the Minehead Pier Project, which has led to plans for a functional structure that could allow access for ferries from the town at nearly all tidal heights. The new pier, subject to financial support, will also become a focus for additional resources for tourism to complement the recent enhancement of the promenade. The project will facilitate better access to the sea for a range of vessels currently limited by extreme tidal patterns, with the introduction of a regular passenger link to South Wales and North Devon a real prospect.

6.27. POLICY TO/2 & CHANGES NOS 131 & 132

Objections

21	West Country Tourist Board
951	Somerset County Council
1004	Tesco Stores Ltd

Conditionally withdrawn objection

124	Council for the Protection of Rural England
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Supporter of PC131

2456	Council for the Protection of Rural England
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Inspector's note

Objection 124, is conditionally withdrawn in response to the insertion of light pollution in criterion (iv) of Policy TO/2 by PC131.

Issues

- (i) The need for the Policy and its possible replacement by a mixed-uses policy for the Minehead Lido site promoting retailing and tourism-related activities.
- (ii) Whether the Policy should be located in section 10.10 of the Plan.
- (iii) Whether the requirement of satisfactory access and parking in criterion (iv) should apply to hotels without parking.

Inspector's reasoning and conclusions

Issue (i)

Objection 1004 incorrectly assumes that Policy TO/2 applies only to the part of the area of the former Lido which is not subject to Policy E/1. In fact, the Tourism area defined on Inset Map 10 covers the whole of the Lido. Policy TO/2 applies to the majority of Minehead seafront from Quay Street to Warren Road and a development scheme, which does not include retail use, has already commenced. In the circumstances I discern no need for a replacement policy

Issue (ii)

The Policy is entirely site-specific to Minehead. However, while I note that the LPA has no firm view on whether it would be more logically better placed in Chapter 10 I find the cross reference to it in Policy MINE/2 sufficient.

Issue (iii)

The objector claims that there are notable examples of successful hotels in the south west region that have little or no on-site parking and that non-car modes of tourism are encouraged by the industry. I find that criterion (vi) inserted in Policy TO/1 by PC130, which I recommend at 6.26.1 above, is consistent with the objection in its requirement that new tourism-related development be accessible by public transport. However, I consider PC132 leaves a serious gap in the Plan in that there is no reference to private parking standards in either Policy TO/2 or in Chapter 7 of the Plan. Indeed, a reference at paragraph 7.41 is deleted by PC170. An applicant for planning permission has no guide as to what will be deemed satisfactory. I shall accordingly recommend that this matter be addressed.

6.27.1. RECOMMENDATIONS

I recommend that:

- (i) The Plan be modified by PCs 131 and 132;**
 - (ii) The matter of on-site parking standards at tourism-related development be addressed with a view to their incorporation in criterion (iv) of Policy TO/2.**
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6.28. POLICY TO/3 & CHANGE NO 133

Objection

730	Environment Agency-South West Region
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Conditionally withdrawn objection

952	Somerset County Council
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Supporter

617	Somerset Wildlife Trust
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Inspector's note

Objection 952 is conditionally withdrawn to the extent that PC133 casts the Policy in positive terms.

Issues

- (i) Whether the Policy provides sufficient protection to the wider environment.
- (ii) Whether the Policy might be more appropriately located in section 10.19 of the Plan.

Inspector's reasoning and conclusions

Issue (i)

I consider that, taken together with appropriate policies in Chapter 4 of the Plan, the reference in the Policy to 'other environmental impacts' provides sufficient protection of the natural environment without modification.

Issue (ii)

I am satisfied that the cross reference to this Policy in paragraph 10.19.17 of the Plan is appropriate.

6.28.1. RECOMMENDATION

I recommend that no modification of the Plan be made in response to this objection.

6.29. POLICY TO/4 & CHANGE NO 134

Objections

22	West Country Tourist Board
953	Somerset County Council

Issues

- (i) Whether the Policy might be more appropriately located in section 10.19 of the Plan.
- (ii) Whether the application of criterion (iv) to hotels without parking should be reconsidered.

Inspector's reasoning and conclusions

Issue (i)

I note that the LPA is indifferent to the location of this Policy in the Plan. In the circumstances I find no overriding reason to relocate it in section 10.19.

Issue (ii)

Objection 22 is identical with objection 21 at section 6.28 of this report, above. The objector claims that there are notable examples of successful hotels in the south west region that have little or no on-site parking and that non-car modes of tourism are encouraged by the industry. I find that criterion (vi) inserted in Policy TO/1 by PC130, which I recommend at 6.26.1 above, is consistent with the objection in its requirement that new tourism-related development be accessible by public transport. However, I consider PC134 leaves a serious gap in the Plan in that there is no reference to private parking standards in either Policy TO/2 or in Chapter 7 of the Plan and an applicant for planning permission has no guide as to what will be deemed satisfactory. I shall accordingly recommend, as at 6.28.1 above in relation Policy TO/2, that this matter be addressed.

6.29.1. RECOMMENDATION

I recommend the matter of on-site parking standards at tourism-related development be addressed with a view to their incorporation in criterion (iv) of Policy TO/4.

6.30. PARA. 6.4.29 & CHANGE NO 135

Conditionally withdrawn objections

732	Environment Agency-South West Region
821	Government Office for the South West

Objection to PC135

2406	Environment Agency-South West Region
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Inspector's note

Objections 732 and 821 are conditionally withdrawn in response to PC135.

Issue

Whether in PC135 'resisted' should be substituted for 'discouraged'.

Inspector's reasoning and conclusions

PC135 discourages further holiday parks and touring caravan sites in the coastal zone. Its wording is consistent with paragraph 4.4 of PPG12, paragraphs 1.8 and 2.9-11 of PPG20, and paragraph 5.25 and Annex B of PPG21 together with Structure Plan Policies STR6, 15, and 23.

6.30.1. RECOMMENDATION

I recommend that the Plan be modified by PC135.

6.31. POLICY TO/5 & CHANGE NO 136

Objections

23	West Country Tourist Board
562	Bourne Leisure Group Ltd
618	Somerset Wildlife Trust
731	Environment Agency-South West Region
822	Government Office for the South West
1101	Countryside Commission

Conditionally withdrawn objection

522	English Nature
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Objection to PC136

2189	Bourne Leisure Group Ltd
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Inspector's note

Objection 522 is conditionally withdrawn in response to PC136 which adds 'nature' before 'conservation' in criterion (ii) of the Policy.

Issues

- (i) Whether the first criterion of the Policy should clarify that the existing provision for touring caravans and tented camping can be inadequate in terms of number and size of sites as well as their quality.
- (ii) Whether the Policy should allow for a more flexible approach to the provision of accommodation at Doniford Holiday Village by deleting 'small-scale' and 'or directly visible from', to distinguish those sites within the AONB from those without.
- (iii) Whether 'nature' should be inserted before 'conservation interests' in criterion (ii).

- (iv) Whether a criterion requiring adequate foul drainage infrastructure should be inserted.
- (v) Whether criteria (i) and (v) of the Policy are appropriate to the determining of applications for planning permission.
- (vi) Whether the Policy should reflect the advisory report published jointly by the Countryside Commission, the English Tourist Board, the National Caravan Council, and the British Holiday and Home Park Association.

Inspector's reasoning and conclusions

Issue (i)

Notwithstanding the reasons advanced in objection 23 for the inadequacy of the existing provision, current national planning guidance does not require applicants for planning permission for tourism development to show that there is a need for their development which cannot be met elsewhere or that existing provision is inadequate.

Issue (ii)

I support the reference to 'small scale' extensions to established caravan sites. It aligns with the need to protect the countryside landscape (Policy LC/3), the Coastal Zone (Policy CO/2) and the Structure Plan support in Policy 23 for sustainable forms of new development. Against that policy background I agree with the LPA that larger scale extensions of caravan sites are inappropriate.

The requirement that this type of holiday accommodation be visually unobtrusive is consistent with the regional Policy TCS1 in RPG10, Policy 23 of the Structure Plan, and the LPA's Landscape Character Assessment introduced by PC20 and (new) Policy LC/3 (PC28). Given that context I find no justification to modify PC136. .

Issue (iii)

I consider the insertion of 'nature conservation interests' by PC136 in criterion (ii) of TO/5 satisfactorily meets objection 618.

Issue (iv)

The responsibility for the approval of the foul drainage infrastructure of proposed development falls to Wessex Water or South West Water and is outside the remit of the planning system. I conclude no reference to it is required in PC130.

Issue (v)

PC136 deletes the draft deposit Plan form of criteria (i) and (v). I consider the references to impact on the landscape and public transport access in replacement criteria (i) and (v) respectively of PC136 satisfactorily meet objection 822.

Issue (vi)

While the source referred to in objection 1101 provides helpful informal advice on the promotion of caravan parks and related matters it does not have the significance of the national planning policy guidance, the RPG, and the Structure Plan, with which authorities the Local Plan is required to be compatible.

6.31.1. RECOMMENDATION

I recommend that the Plan be modified by PC136.

6.32. POLICY OMISSIONS & CHANGE NO 137 - NEW POLICY TO/7

Objections

24	West Country Tourist Board
398	Country Landowners Association
563	Bourne Leisure Group Ltd
1026	Old Cleeve Parish Council

Objection to PC137

2190	Bourne Leisure Group Ltd
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Issues

- (i) Whether a separate policy should deal with budget market/motel accommodation.
- (ii) Whether a separate policy should deal with small scale theme parks in the countryside such as open farms and museums or displays.
- (iii) Whether, given the necessarily restrictive nature of the conservation policies, a specific policy is needed for holiday/caravan parks in the countryside in accordance with the guidance in PPG21 - Tourism, Annex B, Paragraph 8.
- (iv) Whether the Plan provides appropriate guidance on future development in Blue Anchor Bay
- (v) Whether 'small scale' should be deleted from (new) Policy TO/7 as it could inhibit the upgrading of establishments.

Inspector's reasoning and conclusions

Issue (i)

I recognise the trend towards the budget market/travel lodge type of accommodation and that it may affect existing local hotels but can tend to increase quality and value for money. However, such development is associated with the major regional road network. Given the peripheral location of the Plan area in that respect I do not consider the demand for this type of accommodation warrants a distinctive policy. Any proposals for such development would appropriately fall to be considered under Policy TO/1 subject to PC130 within the development limits of settlements or Policy SP/5 subject to PC13 in the countryside.

Issue (ii)

Proposals for such types of attraction as small scale theme parks as open farms, museums or displays referred to by objection 398 are subject to consideration under new Policies SP/5 (PC13) R10 (PC229), and A/1 (PC125). In the circumstances I do not consider a policy specific to these uses necessary.

Issue (iii)

The proposed new Policy TO/7 refers to holiday parks comprising static caravan or holiday chalet/cabin sites. However, I discern no justification for policies and proposals for individual sites. I address the objection to 'small scale' in the tourism policies related to caravan and chalet sites in sections 6.32 and 6.34 of this report above.

On the question whether the Plan is consistent with Annex B of PPG21 I consider it appropriate that proposals concerning holiday parks and caravan/chalet sites be considered in the light of the more recent national, regional, and strategic advice in PPG7, RPG10 and the Structure Plan Review

respectively. These take account of the national policy shift towards sustainability as a criterion of development.

Issue (iv)

Though it is not specific in this respect it seems to me that the guidance sought in objection 1026 regarding development at Blue Anchor Bay is essentially a plea for any proposals to be site-specific. However, I am satisfied that environmental safeguards against inappropriate development are provided by the Settlement Policies and those applicable to Landscape Conservation and The Coast. In that context I am not convinced that an area-specific policy for Blue Anchor Bay is necessary. The new Policy TO/7 is also likely to be relevant to any proposals to extend existing caravan sites in that locality.

Issue (v)

I support the reference to 'small scale' extensions to established caravan sites. It aligns with the need to protect the countryside landscape (Policy LC/3), the Coastal Zone (Policy CO/2) and the Structure Plan support in Policy 23 for sustainable forms of new development.

I agree with the LPA that larger scale extensions of caravan sites are inappropriate and that, contrary to the contention in the objection, upgrading of a site does not necessarily require such significant or larger scale extensions. However, in the interest of clarifying the Plan's provisions I support both PC137 and the additional explanatory text suggested by the LPA. .

6.32.1. RECOMMENDATION

I recommend that the Plan be modified by:

- (i) PC137; and**
- (ii) The addition of the following paragraphs:**

Established holiday park sites (i.e. static chalets/cabin sites) are often out of character with the countryside where they are sited. Appropriate schemes for improving the visual quality of these sites and upgrading standards of accommodation will therefore be supported. Such improvements may include better access and facilities for the mobility impaired.

Proposals to improve the quality of existing holiday sites should normally be contained within current site boundaries. Proposals to extend the site will only be acceptable where this is the only practicable means of achieving improvements to the layout and landscaping in order to reduce the visual impact of the original scheme on the surrounding landscape. Extensions to the boundary of a site are unlikely to be acceptable in the Quantock Hills Area of Outstanding Natural beauty to reflect Policy LC/2. Any proposal which increases the overall number and size of accommodation units will be resisted.