

Chapter 8: Economy and Employment

Introduction

8.0.1 In this chapter we consider three aspects of draft RSS: economic development requirements, retailing and city and town centres and tourism development. Each sub matter is considered in turn as part of this overall economy and employment chapter.

Economic Development Requirements

Matter; 8/1

Policies E1, E2, E3, E4, E5

Background

8.1.1 GOSW referred the Panel to the following documents as the relevant policy background material.

- PPS1 *Delivering Sustainable Development* (Feb 2005).
- PPG4 *Industrial and Commercial Development and Small Firms* (Nov 1992).
- PPS11 *Regional Spatial Strategies* (Sept 2004).

8.1.2 Reference was also made to PTED 10.06 *Employment Land Reviews Guidance Note* (ODPM Dec 2004) and to *Guide to Improving the Economic Evidence Base supporting Regional Economic and Spatial Strategies* (ODPM Sept 2005). It was pointed out that particular interim policy advice is set out in PPS11, prior to a review of PPG4 and that the advice indicates that Regional Planning Bodies should ensure that they complement and assist the implementation of the RDAs economic strategies and as a minimum:

- identify the regional or sub-regional priority areas for economic development and regeneration. This will include, where appropriate, making provision for the location, expansion and promotion of clusters or networks of knowledge driven industry;
- ensure that regionally, or sub-regionally, significant housing, transport and other infrastructure proposals support the above priorities and, where necessary, provide advice on phasing and programming; and
- advise on the need for simplified planning zones, particularly where this will assist business development, and on the general locations and the criteria for strategic site selection, including major inward investment sites, so that sufficient sites are made available to meet business needs while ensuring that major ‘Greenfield’ sites are not released unnecessarily as part of a process of competition between nearby authorities. The RPB should review with other stakeholders, including the RDA, whether all existing strategic employment sites are still needed. For the reasons set out in chapter 1 of PPS11, RSS cannot itself identify specific sites for inward investment.

Issues

8.1.3 In the Panel's view the issues are:

- whether draft RSS represents an adequate spatial plan for the regional economy;
- the provision of sustainable sites and premises to accommodate the full range of the projected employment growth;
- the competition between employment and other uses.

A Spatial Plan

8.1.4 The Regional Assembly claimed that the draft RSS as a whole represented the Spatial Plan for the Economy. It was pointed out that policies such as Policy A were designed to ensure a better balance between job growth and housing supply in the areas where the most job growth was expected and thereby facilitate the economic strategy. The Assembly indicated that SWRDA had been closely involved in the development of the employment policies. The Agency acknowledged the opportunity that it had been given to assist in the development of Section 8 of the draft RSS.

8.1.5 SWRDA argued that the draft RSS needs to establish a spatial plan for the economy rather than just a land use plan for employment and proposed that there is a need for a wider policy. The Agency drew our attention to Policy EC1 'Economic Development' in RPG10 and proposed a new Policy E1 'Successful and Competitive Business.' We accept the view that the draft RSS would be enhanced by a more general policy setting out the general thrust of the draft RSS in terms of the economy of the region. We take this view because of the reliance within the draft RSS on the achievement of higher levels of productivity. However on examining the SWRDA policy proposal (new Policy E1) we find that it includes matters which seem more related to the RES rather than the RSS. We do not consider that the draft RSS can contribute to 'supporting the development of a more entrepreneurial society' nor are we convinced that it can be involved in 'promoting best practice and opportunities for businesses.' As a result we have modified the SWRDA proposal and recommend that a new policy, Policy ES1 should be inserted after paragraph 8.2.5.

Recommendation 8.1.1

- Insert new Policy ES1 with the words as indicated in Appendix C.

Accommodating the Projected Growth

8.1.6 Many participants questioned the approach to economic development set out in the draft RSS. Some participants highlighted the absence of any interpretation of the employment projections in terms of physical requirements. It was pointed out that not all of the job growth need have implications for additional land or business accommodation. Our attention was drawn to the fact that the TTWA job projection referred to significantly larger areas than the JSAs to which they were applied. In our view the job growth projections can only be regarded as very broad indicators and

require further interpretation to provide guidance on economic development. We note for example that a significant amount of the growth is expected in the health and education sectors, which do not normally require business accommodation or employment land.

- 8.1.7 SWRDA drew our attention to the DTZ study¹ that it had commissioned. The study included an assessment of the implications of the employment projections in terms of different types of business accommodation. Unfortunately this study was only published in January 2007 and did not have universal acceptance. In our view this approach should be pursued as it offers greater understanding of the implications of the employment projections. We conclude that further work is required to identify the implications of the projections.
- 8.1.8 The EiP identified great confusion over the question of the availability of employment land and the appropriate level of provision. A number of participants highlighted the fact that some of the JSA sections in Section 4 of the draft RSS include guidance on employment land and others do not. It was also pointed out that the proposed level of provision sought at particular SSCTs is not supported by any justification. It was suggested that the draft RSS simply includes whatever advice was tendered by the Strategic Authorities involved and that there is no common approach.
- 8.1.9 The DTZ study, commissioned by SWRDA provides information on the employment land supply across the region and also provides information on the implications of past rates of take-up of employment land. Unfortunately doubts were cast on the reliability of the output of the study. The Strategic Authorities in the South East provided supplementary information to the EiP, which highlighted the danger of regarding the figures as relating to the SSCTs involved and not to the TTWA area for which the projections were made. As a result the forecast requirements cannot be compared across the region with the appropriate land supply.
- 8.1.10 The Regional Assembly states² that the focus in the draft RSS is on employment provision in its widest sense and states in paragraph A17 that the employment growth figures will provide a useful starting point for the Local Authorities to develop a consistent understanding of the sub-regional and local needs of the economy. In our view this seems guaranteed to generate inconsistency across the region.
- 8.1.11 The Regional Assembly further states³ that by not rigidly setting employment land figures in the draft RSS, flexibility is provided to allow need to be reflected in provision through LDFs. It is claimed that this will lead to more focussed delivery. This is not a view shared by a number of participants who sought more explicit guidance on provision. Gloucestershire County Council state⁴ that *'it is considered that further guidance is required in the draft RSS'*. The South East Strategic Authorities indicate that *'employment land requirements should be such that provision is expressed for individual districts, to provide clarity and guidance for the preparation of LDFs'*.

¹ *The Demand and Supply of Employment Land, Sites and Premises in South West England*, DTZ Consulting & Research, January 2007.

² Regional Assembly Statement on Matter 8/1 para. A13.

³ Regional Assembly Statement on Matter 8/1 para. A16.

⁴ Gloucestershire County Council Statement on Matter 8/1 para. 6.

- 8.1.12 Barton Willmore⁵, indicates that the reconciling of demand and supply is a complex process which needs to be carried out mainly at the LDF stage, but states that the draft RSS needs to provide a framework for undertaking this process. Barton Willmore also highlights the difficulty of making a district assessment when the projections are TTWA based. Devon County Council emphasises the role of strategic sites and the need to set these sites in a context which is wider than the individual local authority area. In this context we note the proposal in the Gloucester/Cheltenham area for the acceptance of the release of employment land at the Gloucester Business Park for housing, while at the same time a case was being strongly made for additional employment land just across the local authority boundary in Cheltenham.
- 8.1.13 In our view the market for employment land has similar characteristics to housing markets in that it tends to reflect the city region or conurbation area rather than individual local authority areas. As the employment projections have been made available at the Housing Market Area level we are of the opinion that this presents an opportunity to generate more meaningful assessments at the sub-regional level. In our opinion the assessment also needs to be carried down to the district level to provide adequate guidance. The example of the Gloucester Business Park quoted above is relevant. The Business Park, although relevant to the economies of both Gloucester and Cheltenham, falls within Tewkesbury District, which must also deal with the competing claims of the Tewkesbury/Ashchurch area.
- 8.1.14 GOSW drew our attention to the Guidance Note *Employment Land Reviews* (ODPM Dec 2004), which advises that employment land reviews may be an appropriate issue for joint LDDs, particularly covering larger urban areas and their TTWAs. We view this advice as confirmation of the desirability of the need to take a sub-regional approach to the matter. In our view the RSS offers the opportunity of a more consistent approach between competing sub-regional areas such as Exeter and Taunton or Swindon and Gloucester/Cheltenham.
- 8.1.15 We conclude therefore that there is an immediate need for further work on this matter to inform the next review of the RSS. We would hope that the DTZ study could be developed to give an HMA/Sub-Regional Framework with District level guidance. We see no conflict between that sort of framework and the more detailed assessment at LDF level that might identify the need for some variation.

Recommendation 8.1.2

- *Further work should be initiated prior to the next review of the RSS to provide a sub-regional framework for the provision of employment land as indicated in Appendix C.*

Employment Land Provision and Review

- 8.1.16 We view the policies in the draft RSS as stop-gaps until the next review. SWRDA have offered new policies which in effect merge Policies E1 and E2 and Policies E3 and E4. While we see some advantage in the proposed consolidation we have some reservations

⁵ Barton Willmore Statement on Matter 8/1 para. 2.6.

concerning the wordings proposed. The SWRDA policy calls for support for the role of airports as ‘economic drivers’, which in our view could generate demand for employment land provision adjacent to Bristol Airport within the Green Belt. We have seen no evidence that justifies that type of provision. We accept that both ports and airports have need for land to accommodate their functional requirements, such as runway related developments at airports and storage /processing activities at ports. Most other economic activities that are linked to ports and airports can be accommodated in the land supply of the adjoining conurbation.

- 8.1.17 The SWRDA policy E2 omits the sequential approach in draft RSS Policy E2, but we are aware of the constant advice from the Regional Assembly that the document should be read as a whole. Furthermore we are not totally convinced of the need for this hierarchical approach in this context, as the requirement should be driven by the employment prospects of each area. We are also concerned that the SWRDA policy proposes that the employment land supply should be involved in the delivery of ‘icon projects’. This description could cover a wide range of activities and by their nature iconic projects need to be dealt with on a one-off basis. We believe that this reference should be excised. The final part of the SWRDA Policy E2 suggests that in identifying strategic employment sites consideration should be given to promoting on-site support facilities including access to child care and training facilities. In our view this level of detail is a matter for local planning and has no place in the identification of strategic sites through the RSS.
- 8.1.18 SWRDA Policy E3 combines draft RSS Policies E3 and E4. The only difference is a requirement to identify and preserve a portfolio of the best employment sites. This was a measure sought by a number of other participants. The example of the Gloucester Business Park shows the relevance of this measure as it represents an important asset in a very strategic location, which cannot be easily replicated. We therefore support the addition. Furthermore, we are of the opinion that this policy correctly reflects the changing needs of business and attempts to maximise the employment contribution arising from development. We therefore support the addition.
- 8.1.19 As a result of our conclusions set out above we recommend that: draft RSS Policy E1, Policy E2, Policy E3 and Policy E4 should be replaced by new Policies ES2 and ES3.

Recommendation 8.1.3

- Replace Policy E1, Policy E2, Policy E3 and Policy E4 with new Policy ES2 and new Policy ES3 and the wording as indicated in Appendix C.

Major Office Development

- 8.1.20 Concern was expressed by a number of participants that the considerable growth in suburban employment development around certain SSCTs implied by the employment projections could threaten the viability of city and town centres. It was suggested that some guidance should be provided to steer the provision of office development towards city centres where there is a greater opportunity to accommodate high intensity developments in a sustainable way. We conclude that the draft RSS should provide

guidance on this matter and it is dealt with in the following section of this Chapter by recommendation 8.2.3, which proposes an amendment to Policy TC1.

Waterside Employment Sites

8.1.21 We see no reason to amend draft RSS Policy E5 on Waterside Employment Sites, but it will require to be renamed as Policy ES4.

Recommendation 8.1.4

- Retain Policy E5 but rename as Policy ES4 with the wording as indicated in Appendix C.

Retailing and City and Town Centres

Matter 8; 8/2

Policy TC1

Background

8.2.1 GOSW drew our attention to the following Government policy documents that relate to this matter.

- PPS1 *Delivering Sustainable Development* (Feb 2005).
- PPG4 *Industrial and Commercial Development and Small Firms* (Nov 1992).
- PPS6 *Planning for Town Centres* (March 2005).
- PPS11 *Regional Spatial Strategies* (Sept 2004).
- PPG13 *Transport* (March 2001).
- PPG17 *Planning for Open Space, Sports and Recreation* (July 2002).
- Guide to Improving the Economic Evidence Base supporting regional Economic and Spatial Strategies (ODPM Sept 2005).

8.2.2 GOSW highlighted PPS6 which sets out in paragraph 2.13 that RSS should:

- develop a strategic framework for the development of a network of centres in their region and, where appropriate, for any identified sub-regions, taking into account the need to avoid an over-concentration of growth in the higher level centres;
- make strategic choices about those centres of regional and, where appropriate, sub-regional significance;
 - where growth should be encouraged; and
 - where appropriate, the need for new centres in areas of planned major growth.
- in broad terms, assess the overall need for additional floor space over the regional spatial strategy period, especially for comparison retail, leisure and office development, and for five-year periods within it and having regard to capacity and

accessibility of centres, indicate where the identified needs would best be met having regard to the Government's objectives; and

- monitor and regularly review the implementation of the strategy.

Issues

8.2.3 In the Panel's view the issues to be considered are the adequacy of:

- guidance on office development;
- guidance on the accommodation of the anticipated scale of retail development for town and city centres;
- guidance on other centres, particularly in relation to the Cribbs Causeway retail development

Office Development

8.2.4 Paragraph 8.4.8 of the draft RSS indicates that '*research has shown that provision will need to be made for additional floor space between 2.7 and 3.2 million sq. m. in Bristol, Weston-super-Mare, Gloucester, Cheltenham, Swindon, Bournemouth/Poole, Taunton, Exeter, Torbay and Plymouth*'. GOSW state that this assessment needs to be more clearly articulated by place. Other participants also sought clearer guidance on this matter. The Regional Assembly indicate in paragraph A11 of the Statement on Matter 8/2 that it does not consider it the role of the RSS, as a strategic document, to provide detailed direction on issues for individual town centres.

8.2.5 In our view it is clear from PPS6, paragraph 2.13 that the RSS is expected to give guidance on the strategic centres. We do not consider the information provided in paragraph 4.8.4 can be regarded as guidance because it is not expressed as a policy. Furthermore it does not disaggregate the figures for the individual centres and is therefore of little use for the preparation of LDDs, other than as a warning of a very general scale of change. The Regional Assembly places the onus on local authorities to make more detailed assessments for individual centres, but this ignores the inter-relationship and competition between SSCTs such as Weston-super-Mare and Bristol or Gloucester and Cheltenham.

8.2.6 The Regional Assembly referred to a number of studies on the need for further office floorspace and the DTZ study was also referred to by other participants because it interpreted the employment projections to show the office component. We do not consider that it is either possible or appropriate at this stage in the RSS preparation process to bring forward guidance on this matter. We believe that the development of guidance on this type of issue would require to be the subject of consultation and SA evaluation. We do consider it to be a serious deficiency and conclude that there is a need for further work prior to the next review. As a result we make the following recommendation.

Recommendation 8.2.1

- *Further work should be carried out prior to the next review of the RSS to confirm the broad order of future need for office floor space and what implications that will have for the strategic centres.*

8.2.7 In addition to the concerns on the lack of guidance on the broad floor space requirements, a number of participants expressed the view that the considerable growth in suburban employment development around the SSCTs implied by the employment projections could threaten the viability of city and town centres. It was suggested that some guidance should be provided to steer the provision of office development towards city centres where there is a greater opportunity to accommodate high intensity developments in a more sustainable way. The Regional Assembly rely on the second paragraph of Policy TC1 despite the fact that it is acknowledges in paragraph A12 of the Statement on Matter 8/2 that research has identified significant levels of out of town office development in the pipeline. The Regional Assembly brought forward an amendment to Section 8 of the draft RSS, which proposes an additional paragraph at paragraph 8.4.9. In many ways this paragraph sets out an approach to the threat of office development outside of the main centres. While the proposed paragraph is expressed in development control terms the Regional Assembly does not propose a policy modification to Policy TC1.

8.2.8 We are of the opinion that the additional paragraph should be inserted as paragraph 8.4.9 and that Policy TC1 should be modified to reflect the directions suggested in the new paragraph.

Recommendation 8.2.2

- That a new paragraph, as indicated in Appendix C, should be inserted as Paragraph 8.4.9 and that the existing Paragraph 8.4.9 should be retained as Paragraph 8.4.10.

Recommendation 8.2.3

- Policy TC1 should be amended as indicated in Appendix C.

Retail Development

8.2.9 Paragraph 8.4.2 of the draft RSS states that the region will need to plan for an increase in provision of retail floor space of between 1.31 and 1.97 million sq.m gross in addition to the current floor space in the region of 3.39 million sq.m. This amounts to a prospective increase of between 38% and 58% and yet no guidance is provided on how that amount of new floor space should be distributed. GOSW state in paragraph 1 of

the Statement on Matter 8/2 that *'it is not clear from the RSS as to whether it has provided an indication as to the location of where growth should be encouraged.'* The same paragraph asks the question; *'Which centres are being earmarked for what quantity of floor space growth?'* The Statement from GOSW notes that housing and employment figures are given for each major location and indicates that PPS6 requires equivalent retail figures. The Regional Assembly position is that the identification of specific floor space figures for PPS6 town and city centre uses is a matter to be determined by local authorities through locally based retail assessments.

- 8.2.10 The Regional Assembly approach ignores the competitive relationship between SSCTs in adjoining local authority areas such as Weston-super-mare and Bristol and Gloucester and Cheltenham. In our view the distribution of this scale of development requires to be done at the regional level. We note that the DTZ Pinda study *South West's Town Centres Regional Study* focussed on assessing floorspace requirements based on four statistical sub-regions for broad retail catchments. This sub-division of the region does not reflect the reality of most shopping trips and we are of the opinion that a more detailed assessment is required. We note in this context that in May 2006 a workshop was held to discuss if any further work could be undertaken to provide further sub-regional guidance on retail and other town centres issues. Paragraph A8 of the Regional Assembly Statement on Matter 8/2 reports concerns that local assessments may only look inwards and not take full account of sub-regional impacts. It is also common practice for local retail assessments to make aggressive assumptions about 'claw-back' from higher level centres. We conclude that there is a need for a regional distribution of the future retail demand.
- 8.2.11 There was some debate on the need for a retail hierarchy. Cushman and Wakefield reminded the EiP that PPS6 requires the development of a strategic framework for the development of a network of centres. Devon County Council indicated that while Policy TC1 was accepted it was considered that there should be some hierarchical aspects to it. The North East Strategic Authorities supported the concept of a hierarchy and pointed out that paragraph 1.3.1 of the draft RSS already identifies a hierarchy. The North East Authorities suggested that a hierarchy could have a 'policy-on' approach for a centre such as Swindon, which it was suggested was 'punching below its weight' at present. We are of the opinion that the hierarchy identified in this report in the modified Policy A would provide a reasonable starting point for any further work. In the view of the Panel any policy approach to the distribution of the overall future demand must take into account the different roles played by centres in the region. In our view the wider role of places such as Bristol, Bournemouth/Poole and Plymouth would have to be recognised.
- 8.2.12 We agree with the view of Devon County Council that Policy TC1 can be accepted as guidance in the meantime. In our view the absence of a hierarchy-based distribution of demand is a serious deficiency, but we do not consider that we have the evidence to carry out a distribution of the future demand at this point in time.
- 8.2.13 As a result of the conclusions set out above we recommend that further work is undertaken to inform the next review.

Recommendation 8.2.4

- *Further work should be undertaken prior to the next review of the RSS to provide the following:*
 - *a more disaggregated estimate of future demand;*
 - *a hierarchy-based distribution;*
 - *an assessment of the capacity of centres; and*
 - *the identification of where growth should be encouraged including new centres in areas of planned growth.*

Other Centres

- 8.2.14 At the EiP there was a discussion of the future role of the Cribbs Causeway centre. This centre is mentioned in paragraph 8.4.6 in the draft RSS as an out-of-town centre, which is described in the draft RSS as a major visitor attraction generating high volumes of car journeys. The draft RSS indicates in Policy TC1 that the development of major new regional shopping facilities outside town and city centres will not be supported, but some participants expressed concern that the policy did not restrict the continued growth of the centre. This concern is related to paragraph 4.2.11 of the draft RSS, which refers to the need for investigation to take place with regard to Cribbs Causeway's role as a centre for local communities in the light of planned development around Bristol. Paragraph D6 of the Regional Assembly Statement on Matter 8/2 indicates that the draft RSS does not rule out the future potential role that Cribbs Causeway could play if need was identified in line with the policy tests of PPS6 and development comes forward in line with requirements outlined in PPG13: Transport.
- 8.2.15 Paragraph 4.2.11 of the draft RSS states that '*opportunities for redevelopment in the Cribbs Causeway retail area on the north west edge of the urban area will need to be investigated to enhance its role as a centre for local communities in the light of planned development.*' A map of the Cribbs Causeway Retail Park was provided at the EiP and the scope for further development was discussed. The opportunity to intensify the use of the surface level car parks was identified together with the fact that the mall adjoins an area of single storey retail outlets with associated car parking. We conclude that there is substantial potential scope in the area for further retail development.
- 8.2.16 As noted above the draft RSS acknowledges that the Cribbs Causeway Retail Park is a major visitor centre and, as paragraph D3 of the Regional Assembly Statement on Matter 8/2 indicates, it attracts shoppers from a wide area and ranks number 25 on the DTZ list of centres for the region. Given the scale and quality of provision in the Retail Park it is difficult to find a strategic justification for further retail growth '*to enhance its role as a centre for local communities in the light of planned development*'. The provision of enhanced local services at the Retail Park to serve the planned development has been dealt with in proposed Policy SR2.
- 8.2.17 We note that paragraph 8.4.12 indicates that '*proposals for facilities at out-of-centre locations should not be detrimental to the regeneration, vitality and viability of the centre*'. This text reads like a policy statement, but is not reflected in Policy TC1. We

conclude that the Regional Assembly has elected not to take a strategic judgement on these matters and, as indicated in the above quote from paragraph D6, is relying on development control mechanisms. In our view the future of the Cribbs Causeway area should not be dealt with on a one-off basis, but as part of the wider network of centres that can be expected to be needed to serve the proposed urban extensions in the Greater Bristol conurbation. Given the scale of the Cribbs Causeway retail facilities it would seem that the focus should be placed on the establishment of a balanced network of centres around the conurbation.

- 8.2.18 The draft RSS also mentions Clarks Village in central Somerset as a ‘major shopping centre’. The Panel visited this centre, noted its proximity to the existing centre of Street and the anomalous scale of the development in relation to the adjoining settlement. Given the relative isolation from any planned growth areas there would seem to be little justification for further strategic growth.
- 8.2.19 It is noticeable that the draft RSS is silent on the retail implications of the new centres that will emerge to serve the planned developments proposed. The issue is not restricted to the Bristol conurbation as new centres will be required at the new communities of Sherford and Cranbrook and the urban extensions at places such as Gloucester, Cheltenham and Swindon will also require new local centres. The scale of such local developments and the strategic location of the urban extensions could encourage retail developments that compete with rather than complement the ‘mother’ centre. As these new centres are a product of the draft RSS, we conclude that the draft RSS should provide the context for their planning.
- 8.2.20 On the basis of our conclusions we are of the opinion that there is a need for greater clarification on the planning of retail centres outside the main strategic centres. As Policy TC1 mainly deals with the planning of the town and city centres, we conclude that there is merit in creating another policy to clarify the context for the planning of other centres in the region. As a consequence we propose to delete the last sentence of Policy TC1 and place it in the new Policy TC2. We propose that the new policy should cover the need for new regional shopping centres, strategic extensions to existing out-of-town centres and the context for new centres to serve new communities and urban extensions.
- 8.2.21 We recommend that the final sentence of Policy TC1 should be deleted and new Policy TC2 should be inserted.

Recommendation 8.2.5

- Insert new Policy TC2 Other Centres with the wording as indicated in Appendix C.

Tourism

Matter 8; 8/3

Policies TO1, TO2, TO3

Background

8.3.1 After the submission of the draft RSS, the Government published guidance on tourism *Good Practice Guide on Planning for Tourism*⁶. Since then the SWRA has worked with and gained agreement with the South West Regional Development Agency, South West Tourism and Culture South West to revise⁷ the whole of tourism section of the draft RSS including the policies. In doing this regard was had to *People Places and Spaces*⁸. The Panel's comments and recommendations are based on this revision.

Issues

8.3.2 In the Panel's view the three groups of issues which arise in this section are:

- compliance with DCLG advice on Tourism - The Good Practice Guide;
- particular issues that require attention.

The Good Practice Guide

8.3.3 The *Good Practice Guide on Planning for Tourism* advises on what the RSS should make clear (paragraph 3.10), its vision and strategy, the contribution to broader objectives, the aspirational level of growth and any special characteristics. The next paragraph (3.11) sets out 8 bullet points on what the RSS should cover:

- what the scale and distribution of tourist activity within the area is and what it is likely to be. The strategy needs to be clear about what degree of change it is seeking to oversee, what the nature of that change will be and where it will occur;
- likely future trends and change in volume, distribution and type of activity. There needs to be an understanding of what the underlying trends are and how the strategy intends to respond to the opportunities which they present;
- what the implications of those trends are for land-use, traffic flows, and the transport system. It should explain the extent to which these trends are (i) dependent upon improvements to the transport network and (ii) where they are likely to increase the need for such improvements;
- identification of areas within the region where there are, or are likely to be, any problems associated with growth or decline in tourism. For example, it might be necessary to reconcile demand for tourist accommodation with the need for affordable housing within an area;

⁶ *Good Practice Guide on Planning for Tourism*, DCLG, May 2006.

⁷ EiP Statement of SWRA to Matter 8/3, Tourism –Appendix 1 Proposed changes to Section 8.5.

⁸ *People Places and Spaces - A Cultural Strategy for the South West*, Consultation Draft, April 2007.

- how increased demand for tourism might be best accommodated. It might be that the provision of accommodation and attractions should be increased in towns adjoining existing resorts in order to spread the benefits and to diffuse pressures;
- environmental impacts of tourism and, where these have adverse effects, how they can be tackled;
- the need to protect key tourism assets. In addition to features that already have statutory protection (e.g. national parks), there will be other features such as the wider environment, the quality of beaches, choice of accommodation, availability of sports and leisure facilities and the presence of ‘night life’ that are important in sustaining the attractiveness of the area; and
- ways in which tourism can contribute positively to other objectives e.g. economic development, regeneration, rural diversification, conservation, and environmental improvements.

8.3.4 Without going through each of the above points it is clear that the draft RSS does not indicate the degree of change that might be expected in different sectors, change in trends and the impacts on traffic flows and the environment and so on. Maybe because of the time constraints, the RSS does not make a response to these bullets. In this regard, the Panel finds that the draft RSS does not meet the requirements of the Good Practice Guide and this part of the RSS should be the subject of an early review.

Recommendation 8.3.1

- *The section on Tourism should be subject an early review of the RSS.*

Policies and text

- 8.3.5 The Panel appreciates the pressures that bore upon the SWRA to produce a speedy response to the revised guidelines. Although the Panel has some concerns regarding the response to the Good Practice Guide, we considers that the revision is a step forward and, subject to the comments below, should be retained until the next review.
- 8.3.6 In revised Policy TO1 the first paragraph states that various bodies over which it has no control will promote the development of sustainable tourism. This is outwith its powers. The sentence should read: “*Local Authorities, regional partners, stakeholders and the tourism industry (particularly Destination Management Organisations) should have regard to the development of sustainable tourism by:*”. The Panel recommends that change to Policy TO1.

Recommendation 8.3.2

- Modify replacement Policy TO1 as indicated in Appendix C.

8.3.7 In Policy TO2 the second paragraph refers to *“investing in new facilities where they would be viable into particular markets suited to their location”*. In the Panel’s view these references to investment and viability are not appropriate in the RSS. The second paragraph should read: *“The role of existing resorts should be maintained and enhanced, especially the major resorts of Bournemouth, Poole, Torbay, Weymouth, Weston-super-Mare and Newquay, by safeguarding existing high quality accommodation and facilities, developing new facilities where appropriate and be of an appropriate scale and supporting the specialisation of resorts into particular markets suited to their location”*.

Recommendation 8.3.3

- Modify replacement Policy TO2 as indicated in Appendix C.

8.3.8 The revised Policy TO1 and revised paragraph 8.5.11 of the RDS refers to tourist accommodation. This paragraph 8.5.11 is directed at existing stock. But Policy TO1 is somewhat ambiguous, other than a reference to accommodation related to outdoor leisure pursuits and recreational cycle and footpath networks. Otherwise, there is no guidance towards the provision of new tourist accommodation – of whatever sort. Clearly, this is a matter for a review of the RSS (See recommendation 8.3.1 above). In the meantime we believe that new tourist accommodation should be referred to in the text of the RSS. In the absence of any guidance, the Panel recommends that the words “existing and new” be inserted in the second sentence of paragraph 8.5.11 so that it would read, “The tourism industry should focus on maintaining and enhancing the diversity, quality and provision of existing and new accommodation stock”.

Recommendation 8.3.4

- Insert the words “existing and new” in the second sentence of new paragraph 8.5.11 as indicated in Appendix C.

Particular Issues

Landscape restoration and tourism

8.3.9 The Panels attention at the EiP was drawn to the development of the Cotswold Water Park, particularly with reference to the “restoration” of mineral extraction sites. That has provided not only a tourist water facility and tourist accommodation but also a

substantial environmental asset over and above that which pre-dated the mineral extraction. The Panel feels that this has some positive relevance to furthering the opportunities for restoration of clay pits in the Cornwall landscape. Again, this must be for a future review of the RSS, although there would seem to be no reason why this arena of restoration could not be advanced via the LDD process.

Urban tourism

- 8.3.10 There was a rather muted enthusiasm at the EiP for furthering the opportunities for “urban tourism”. It seems to the Panel that there should be a role for the RSS to set out a regional spatial aspect to urban tourism provision in the region especially as sustainable locations are to be sought for future proposals. If only for the reason that there may not be the market for similar enterprises in a number of locations. However, again, this is a matter to be considered at the next review.

Transport and tourism

- 8.3.11 We understand that some 90% of all visitors to the southwest arrive by car. It hardly needs saying that a modal shift to public transport is desirable. This is supported in the new Policy TO1 and in the revised text which directs new tourism to sustainable locations. However, it is unrealistic to assume that within the short or medium-term a modal shift of any sizeable impact could be accommodated. Some parts of the tourist economy are dependent on car-based travel.

Expansion of existing facilities

- 8.3.12 Some participants sought support from the RSS for the expansion of existing tourist facilities (attractions and accommodation) in locations where development would not normally be allowed. For instance near rivers or on the flood plain where tourist activities could be managed to avoid conflict with flood dangers. And there was some criticism that some local authorities were not as helpful as they might be to the holiday homes sector. The Panel takes the view that the RSS strategy as a whole, together with the revised tourism section, provides sufficient guidance for the LDF process, which is the local policy background to development control decisions.

Specific attractions

- 8.3.13 The EiP received a number of statements that sought recognition in the RSS for various facilities for instance, recreational facilities, the citing of Bristol and Bath in Policy TO2 and the identification of Swindon as a tourist location. The Panel are of the view that naming particular places is beyond the scope and ability of this Panel. And it makes no recommendation on these; it is content for the text to remain as it is.

Major New High Quality, High Profile (‘Iconic’) Built Attractions

- 8.3.14 From the EiP discussions and against the recommended early review, the Panel is not suggesting any changes to revised Policy TO3.

Recommendation 8.3.4

- Replace draft RSS Policy TO3 with revised Policy TO3 as indicated in Appendix C.