

Thanet District Council **Matter Statement**

Matter 11 - Tourism (Policies E07-E14)

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Matter 11 – Tourism (Policies E07-E14)

Issue 1 – Serviced Tourism Accommodation – Policy E07

Q1. How will decision-makers, developers and local communities determine whether proposals for tourist accommodation are “well related to existing built development”? Does this apply in the main built-up areas or across the District? Is the policy effective?

The policy applies across the District and not just within the urban and village confines. The policy was designed to be equally supportive of tourist accommodation in the rural area in accordance with paragraph 28 of the NPPF. In order to avoid new isolated developments which would harm the character of the countryside it was considered that locations well related to existing built development would be appropriate locations adjacent to and supporting rural communities.

It is considered that “well related to existing built development” is clear and provides an element of flexibility but that it could be made clearer by the proposed modification below.

Q2. Is the Plan consistent with paragraph 28 of the Framework which, amongst other things, states that plans should support sustainable rural tourism and leisure developments that benefit businesses in rural areas? Q3. What impacts does Policy E07(1) seek to avoid? Is the policy sufficiently clear? Is it effective?

Yes, it is considered that Policy E07 is consistent with paragraph 28 of the NPPF with the proposed modifications below. It supports the provision and expansion of tourist and visitor facilities in appropriate locations.

The policy mainly seeks to avoid isolated new development, unacceptable traffic impacts and harm to the character of the countryside and nature conservation.

Policy E07 - **Serviced** Tourist Accommodation

The Council will permit the development of new serviced tourist accommodation, including extensions and improvements to existing accommodation, **in sustainable locations provided that:** ~~where this would be well related to existing built development and subject to the following criteria:~~

- ~~1) it is of an appropriate form, scale and design appropriate to its surroundings; does not impact on the surrounding area, including~~
- 2) it does not cause unacceptable impact on the road network or highway safety;**
- ~~3) it is Should be in sustainable locations and accessible by a range of means of transport;~~
- 4) If it is located in a rural area, that it respects the character of the local countryside and is sensitive to its defining characteristics; Outside of the urban area development should respect landscape character and nature conservation value.**
- 5) Sufficient mitigation should be provided to prevent against any material increase in**

recreational pressure on designated nature conservation sites.

Issue 2 – Self-Catering Accommodation – Policy E08

Q1. What is the justification for requiring proposals for self-catering accommodation to be well related to the primary and secondary road network? Is this requirement clear to decision-makers, developers and local communities? Is it effective?

Most self catering accommodation in Thanet is in the form of caravan parks. The Council would seek to direct such large vehicles to areas of the road network that can safely accommodate them.

Q2. What is the justification for requiring proposals to be capable of being extensively landscaped? Is this necessary for all development proposals, regardless of size or location?

Most of the self catering accommodation in Thanet is in the form of caravan parks which can be highly visually intrusive in the countryside.

It is considered that the policy should differentiate between self catering accommodation and caravan/touring parks in the open countryside. The following modification is suggested for the Inspectors' consideration:

Policy E08 - Self Catering Tourist Accommodation

Proposals for the development, diversification, upgrade or improvement of self-catering accommodation will be permitted ~~subject to the following criteria~~ provided that:

- ~~1) Should be~~ **1) it is sustainably located;**
- ~~2) it is of an appropriate form, scale and design appropriate to its surroundings; siting design, scale and access.~~ **2) it is of an appropriate form, scale and design appropriate to its surroundings;**
- ~~3) in relation to a caravan and camping park, that it is~~ **3) in relation to a caravan and camping park, that it is well related to the primary and secondary road network; and**
- ~~4) if it is located in a rural area, that it respects the character of the local countryside and is sensitive to its defining characteristics. Should be capable of being extensively landscaped such that its impact on the character of the area is minimised.~~ **4) if it is located in a rural area, that it respects the character of the local countryside and is sensitive to its defining characteristics.**
- 5) sufficient mitigation should be provided to prevent any material increase in recreational pressure on designated nature conservation sites.**

Q3. What are the reasons for requiring new tourist accommodation to mitigate the impacts of recreational disturbance on nature conservation sites (Policy E07), but not new self-catering accommodation?

This is a modification request from Natural England that the Council have agreed to. Q2 above sets out the new policy wording.

Issue 3 – Protecting Existing Tourist Accommodation – Policy E09

Q1. How has the threshold of 10 or more bedrooms been determined in Policy E09? What is it based on and is it justified?

Officers from planning and tourism listed hotels of importance to Thanet's tourist economy and the larger businesses were considered important, many of which occupy desirable seafront locations. The decision was taken not to protect all tourist accommodation as the Council did not wish the policy to be too onerous on small businesses and it was considered 10 bedrooms was a reasonable threshold.

Q2. How will decision-makers, developers and local communities determine when Policy E09 applies? What constitutes “high quality” tourist accommodation for this policy?

A comment was received at the Preferred options consultation in 2015 that this policy could have the effect of retaining a 10 bedroom “dump”. The decision was taken to add the term “high quality” to allow the decision maker some flexibility on what hotels were worthy of retention. In order to assist with this the policy states that in determining high quality the opinion of industry experts may be sought. At present this would be Visit Kent.

It may be appropriate to add in to the policy that the cost of refurbishment and improvement is a factor to be taken into account.

Q3. What is the justification for requiring evidence of occupancy rates over a period of 3 years, in addition to marketing, to demonstrate that the accommodation is not viable?

Occupancy rates over 3 years is easy information for a hotel to collate and gives a clear indicator as to the decline or otherwise of a hotel business. It also provides information for the industry experts to assess when helping the Council to make a decision.

Issue 4 – Beaches – Policies E10, E11 and E12

Q1. What is the rationale and justification for identifying major holiday beaches (Policy E10) separately from intermediate beaches (Policy E11)?

The major holiday beaches are located directly adjacent to/within the main town centres of Broadstairs, Margate and Ramsgate and have access to main town centre parking provision. Their character is leisure focused with facilities such as deck chair hire and rides and activities for children. In the summer these beaches are extremely busy with holidaymakers. The policy is supportive of the provision and upgrade of a wide range of recreational facilities.

The intermediate beaches are all covered by SSSI designation and therefore it was not appropriate to support a wide range of recreational facilities and services on these beaches. These beaches are more suited to small scale facilities.

Q2. Does the Plan provide enough detail to clarify to decision-makers, developers and local communities what type of development is permitted and where? Are Policies E10-E12 effective?

The major holiday beaches policy supports a wide range of recreational facilities and tourism. The intermediate beaches policy supports small scale tourism and leisure development compatible with the character and appearance of the particular beach. The undeveloped beaches policy restricts all but essential development.

It may be appropriate to merge the three policies into one to emphasize the differences in approach. It is also considered that Policy E11 should specifically mention compatibility with character and appearance and this is suggested as a modification subject to the Inspectors' agreement.

Q3. What is the justification for restricting new built facilities on undeveloped beaches (Policy E12)? Under what 'exceptional event' may development be considered acceptable? Is this sufficiently clear to decision-makers, developers and local communities?

The undeveloped beaches in Thanet are wild in character and new built facilities would be incongruous here. These beaches are largely covered by SSSI's, SPA/Ramsar and the Undeveloped Coast Landscape Character Area. The Landscape Character Assessment August 2017 gives guidance on the undeveloped coast areas which states that the sense of remoteness and wildness should be conserved and the Council should maintain the essentially rural/natural/remote character of the coast minimising clutter, fencing and signage.

An example of an exceptional event would be something like flood defences or essential infrastructure such as sewage treatment. It may be appropriate to remove the reference to exceptional event.

Issue 5 – Language Schools – Policy E13

Q1. What is the justification for Policy E13? Will the criteria be effective in seeking to meet its aims and objectives?

Language schools are a very important part of Thanet's tourism economy but in certain parts of Broadstairs cause noise and nuisance issues where a number of these uses are concentrated. This can include coaches collecting and dropping students off and large gatherings of young people. The policy states what impacts it seeks to avoid.

Issue 6 – Quex Park – Policy E14

Q1. What is the justification for requiring development proposals at Quex Park to be accompanied by a transport assessment? Is this appropriate for all development proposals, regardless of size?

All development proposals are required to be accompanied by a transport assessment. A number of respondents to the 2015 Preferred Options consultation were concerned about the traffic impacts of increasing visitor numbers to Quex Park and so a cross reference to TP01 was added.

Q2. In considering a proposal for new development how would a decision maker consider the setting of relevant heritage assets at Quex Park?

The policy should add “and their settings”. The issue of setting would be decided by reference to HE’s guidelines.

The park is also a landscape character area in its own right and the Landscape Character Assessment August 2017 contains guidance for decision makers i.e Maintain the essentially undeveloped character of the landscape providing the setting to Quex House.