

Topic Paper: Leisure and Tourism

December 2017

To accompany Guildford borough Submission Local Plan: strategy and sites



GUILDFORD
BOROUGH

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Topic paper: Leisure and Tourism

1. Purpose of this topic paper

- 1.1 This document is one in a series of topic papers that set out how the Council have has developed the key strategy and policies contained within the ‘Proposed Submission Local Plan: strategy and sites’. Each topic paper looks at the relevant national and local guidance that informs the emerging Local Plan. An explanation and description of how the strategy has developed and the information, evidence and feedback that has informed the choices made in formulating the policies, are provided.
- 1.2 The topic papers are intended to provide background information which supplements the Local Plan and as such do not contain any policies, proposals or site allocations. Topic papers have been produced to accompany the Submission of the draft Local Plan to the Secretary of State for examination.
- 1.3 The main areas covered by this topic paper are:
 - The national planning policy context for leisure and tourism uses
 - An overview of key evidence which has informed the policy approach taken in the Local Plan
 - An appraisal of the local context and key policy considerations
 - An overview of the Local Plan policy approach adopted in the Proposed Submission Local Plan for leisure and tourism uses in the borough
 - An overview of how the Draft Local Plan consultation in June 2014 has informed the revised policy

2. Defining leisure and tourism

- 2.1 The Oxford Dictionary¹ defines leisure as the “use of free time for enjoyment”. In planning terms, the Town and Country Planning (Use Classes) Order classifies leisure uses within the D2 ‘assembly and leisure’ land-use category. Cinemas, skating rinks, gymnasiums and areas for indoor or outdoor sports are amongst some facilities recognised as leisure uses.
- 2.2 The World Tourism Organisation defines tourism as “a social, cultural and economic phenomenon which entails the movement of people to countries or places outside their usual environment for personal or business/professional purposes. These people are called visitors (which may be either tourists or excursionists; residents or non-residents) and tourism has to do with their activities, some of which imply tourism expenditure”.

3. Policy Context

National context

¹ Oxford Dictionary 2016 (<http://www.oxforddictionaries.com/definition/english/leisure>)

- 3.1 A Local Plan can only be found sound by a Planning Inspector if its policies are deemed to be positively prepared, justified, effective and consistent with national policy and legislation. The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework for Local Planning Authorities in England and is supported by National Planning Practice Guidance (NPPG).
- 3.2 To support the vitality and viability of town centres, paragraph 23 of the NPPF requires us to ‘allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed’.
- 3.3 Paragraph 24 of the NPPF states that Local Planning Authorities (LPAs) should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. This means that LPAs should require applications for main town centre uses to be located in town centres, then in edge-of-centre locations and only if suitable sites are not available should out-of-centre sites be considered. When considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites that are well connected to the town centre.
- 3.4 The NPPF’s glossary provides a definition of main town centre uses. Amongst other things, these include leisure and entertainment facilities, the more intensive sport and recreation uses (such as cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls) and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). Most leisure uses fall within the D2 land use class, whilst hotels are commonly classified as a C1 use.
- 3.5 When considering applications for leisure uses outside of centres and not in accordance with the Local Plan, local planning authorities should require applicants to submit an impact assessment if the proposal involves more than 2,500 sq m (or a locally set threshold) of additional leisure floorspace. The impact assessment must consider the impact of the proposal on existing, committed and planned investment in a centre or the proposal’s catchment area and the impact of the proposal on town centre vitality and viability up to five years (or ten in the case of major application) from the time the application was made. Applications which fail to satisfy the sequential test or which would have a significant adverse effect on one of the above factors should be refused.
- 3.6 Paragraph 25 of the NPPF emphasises that the sequential approach should not be applied to small-scale rural development. The NPPF (paragraph 28) also states that LPAs should support sustainable rural tourism and leisure developments that benefit business in rural areas. Given the large rural areas within our borough, this guidance is particularly important.
- 3.7 National Planning Practice Guidance (NPPG) emphasises that “tourism is extremely diverse and covers all activities of visitors. Local planning authorities, where appropriate, should articulate a vision for tourism in the Local Plan, including identifying optimal locations for tourism. When planning for tourism, local planning authorities should:

- consider the specific needs of the tourist industry, including particular locational or operational requirements;
- engage with representatives of the tourism industry;
- examine the broader social, economic, and environmental impacts of tourism;
- analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment; and
- have regard to non-planning guidance produced by other Government Departments.”

3.8 The NPPF also states that local planning authorities should recognise that certain main town centre uses have particular market and locational requirements which means that they may only be accommodated in specific places. It is therefore recommended within NPPG that some flexibility should be applied in using the sequential approach described.

Neighbourhood Plans

- 3.9 Neighbourhood Planning enables Neighbourhood Forums and Parish Councils to develop a plan setting out a vision and planning policies for their designated neighbourhood area. Those ‘Neighbourhood Plans’ which are successfully adopted will form part of the statutory development plan for the area that they cover. Where a Neighbourhood Plan is adopted or emerging before an up-to-date Local Plan is in place, the local planning authority should take it into account when preparing Local Plan policies.
- 3.10 There is currently one adopted Neighbourhood Plan (Burpham), one emerging, post-examination Neighbourhood Plan (Effingham), and one progressing towards examination (East Horsley) within the borough. Six other Parish Councils are also currently producing Neighbourhood Plans.
- 3.11 Policy B-C1 of the Burpham Neighbourhood Plan addresses development proposals relating to existing and prospective community and leisure facilities in the area. There is not considered to be any direct conflict between the policy and Policy E6 of the emerging Local Plan although the Neighbourhood Plan affords less stringent protection to existing facilities than the Proposed Local Plan.
- 3.12 In relation to East Horsley, the emerging Neighbourhood Plan allocates the Thatcher’s Hotel site for 22 homes. This site was removed from the Submission Local Plan following an unsuccessful appeal for the replacement of the hotel with 49 homes. This allocation therefore conflicts with Policy E6 which protects hotels, however the neighbourhood plan currently carries very little weight.
- 3.13 The weight given to an emerging plan will depend on, among other things, the extent to which there are unresolved objections to the plan (NPPF paragraph 216). Therefore, an emerging neighbourhood plan will pick up weight once evidence of consultation is published and the level of unresolved objection is known. At time of writing, the Effingham Neighbourhood Plan has been through examination, which has resolved any remaining objections, and is progressing towards a referendum. The East Horsley neighbourhood plan is progressing towards examination and is accorded very little weight at this stage.

4. Key evidence

- 4.1 The National Planning Policy Framework requires us to develop policies based on up to date evidence. Our evidence base comprises documents that have helped inform past and current stages of our Local Plan policy development. The views and feedback of the community, key stakeholders and partner organisations also form part of our evidence base.
- 4.2 Relevant documents of the evidence base include:
- [Retail and Leisure Study \(2014\) and 2017 Addendum](#)
 - [Guildford Borough Economic Strategy 2013-2031](#)
 - Tourism South East Research Services (2015) - The Economic Impact of Tourism: Guildford 2014
 - [The Enterprise M3 Strategic Economic Plan 2014-2020](#)
 - [Surrey Hotel Futures Study 2015](#)

The Guildford Visitor Strategy (2014-2020) has also informed the development of Policy E6.

- 4.3 Documents forming part of the evidence base are available to read on the Council's website via the following link: www.guildford.gov.uk/researchandevidence

5. Appraisal

Local context

- 5.1 Tourism is an important, and growing, sector of the borough's economy. The industry generated approximately £335million for local businesses in 2015². Such contributions were partly down to the number of overnight visitors; the borough hosting 347,000 staying trips in 2015. Over seventy percent of these overnight stays were made by domestic visitors³.
- 5.2 The visitor economy can play a significant role in increasing the borough's prosperity. In 2015, tourism related expenditure supported 4,528 full time equivalent jobs and 6,185 actual jobs (a figure that accounts for the seasonal nature of employment associated with tourism); accounting for 8.6% of total employment in Guildford³.
- 5.3 Guildford's attractive countryside, leisure opportunities, heritage and retail offer are crucial to attracting visitors to the borough. A number of tourist attractions are located in, or within close proximity to, the town whilst the University of Surrey also draws visitors to the area. Tourist attractions within our administrative area include, but are not limited to, the following sites:
- RHS Wisley
 - Guildford Summer Festival
 - Watts Gallery
 - Electric Theatre
 - Surrey Sports Park
 - Loseley House
 - Hatchlands Park

² Guildford Tourism Economic Impact Estimates 2015 (Tourism South East)

- Guildford Castle
- Guildford Cathedral
- G Live
- Yvonne Arnaud Theatre
- Guildford Spectrum
- Craggy Island Climbing Centre
- The River Wey
- Guildford High Street
- Guildford Museum
- Ash Museum

- 5.4 Despite the growth of the Tourism sector, the Surrey Hotel Futures Study (2015)³ suggests that there is an undersupply of visitor and business accommodation in Guildford. Whilst there is market potential and hotel company interest in luxury country, 4*, boutique and budget hotels and serviced apartments in the Guildford area, there are not thought to be any live development proposals other than the redevelopment of a small hotel located at a shooting range in the west of the borough.
- 5.5 A failure to provide additional accommodation could limit the borough's ability to host future events and reduce its appeal as a business and visitor destination, thus stemming the growth of the visitor economy. Conversely, the recent trend in conversions of guesthouses and hotels to residential and other uses may worsen the existing undersupply of bed spaces in the borough.
- 5.6 Leisure uses are important to enhancing the vitality and viability of town centres and improving the social wellbeing of residents. The Council's Retail and Leisure Study⁴ (2014; and 2017 Addendum) indicates that the borough has a relatively good choice of leisure uses and that participation rates for particular leisure activities, namely restaurants, cinemas, concerts and theatres, is high.
- 5.7 Subject to demand, the high participation rate offers potential to enhance the borough's overall leisure offer. The study also confirms that there remains potential to strengthen and improve the leisure offer in the borough's main centres. Such development can stimulate the evening economies of our urban centres, and by increasing dwell times during the day, provide benefits to other shops and businesses.

Policy considerations

- 5.8 The tranquillity of Guildford's surrounding countryside combined with the vibrant and bustling town centre offers a unique appeal to visitors. The town's historic core, particularly the iconic high street, also plays a significant role in attracting visitors to Guildford.
- 5.9 Providing a number of shops, restaurants, performance venues, galleries and historic attractions, Guildford's town centre is the core focus for tourist attractions and leisure

³ Surrey Hotel Futures Report (http://www.surreycc.gov.uk/_data/assets/pdf_file/0011/68384/SURREY-HOTEL-FUTURES-STUDY-FINAL-REPORT-AUGUST-2015.pdf)

⁴ Guildford Borough Council Retail and Leisure Study (2014) and February 2017 Addendum (<http://www.guildford.gov.uk/newlocalplan/economy>)

facilities in the borough. The wider town offers other leisure opportunities, including ice skating and indoor bowling. Rural areas also provide an avenue for tourism and outdoor leisure pursuits; the borough's countryside containing a number of formal parks, gardens and opportunities for recreation such as rambling, horse riding and cycling.

- 5.10 The studies set out in paragraph 4.2 describe the economic benefits associated with tourism and the scope to enhance the borough's leisure offer. Developing these sectors can create further prosperity, improve the social wellbeing of residents and enhance the vitality and viability of the borough's town and local centres. Whilst it is vital that development conserves the special natural and historical features of the borough, which undoubtedly form a large part of Guildford's appeal as a visitor destination, policy support for leisure and tourism development in appropriate locations can help provide significant benefits to the borough and its residents.
- 5.11 Whilst there are a number of places to stay in and around Guildford, the Surrey Hotels Future Study (2015) indicates that there is significant market demand and developer interest in the provision of further tourist and business visitor accommodation. With statistics indicating that the borough is becoming an increasingly popular place to visit, and the number of overnight stays rising, it is vital that more accommodation is provided to capitalise on and enhance the borough's appeal as a visitor destination. More conference facilities are also required to promote Guildford as a business hub.
- 5.12 By recognising the above considerations, planning policy can support the borough to increase its appeal to business and tourist visitors. Enhancing the leisure offer can also improve social wellbeing amongst residents and enhance the vitality of our town and district centres. The strength of Guildford town centre as a retail centre and leisure hub can be reinforced through planning policy whilst the provision of further cultural facilities, including museums, theatres and galleries, may be encouraged to broaden the borough's appeal as a visitor destination.
- 5.13 The financial and employment benefits associated with tourism and leisure mean that any planning policy supporting the visitor and leisure experience should be closely aligned with the borough's planned economic growth. However, a policy should also recognise the harm development can cause to the natural and built environment and relate to other policies of the Proposed Submission Local Plan (particularly those regarding accessibility and good design). As noted previously, the borough's existing countryside and built environment are in themselves significant attractions.
- 5.14 When considering whether to promote the leisure and tourist experience in the Local Plan, it is important to identify the possible consequences of not having a policy in place or relying on policies from the Council's saved Local Plan 2003 which may later be construed as out-of-date. Saved policies of the 2003 Local Plan promote the provision of new, and safeguarding of existing, arts and entertainment facilities and visitor accommodation. However, the policies fail to promote the development of tourism or other leisure uses in the borough or provide a directional focus for such development.
- 5.15 The failure to include a comprehensive policy within the new Local Plan covering development related to leisure and tourism uses may result in proposals for such

uses not being supported in the planning application process or proposed (and approved) in inappropriate locations. Similarly, if saved policies of the Local Plan 2003 are not adequately replaced and are deemed to be out-of-date at a later point in time, there may be a greater likelihood of change of use applications relating to C1 and D2 uses being granted planning permission; increasing the risk of the borough losing some of its existing leisure and tourism facilities.

- 5.16 The loss of existing leisure and tourism facilities, and failure to promote the development of greater provision, could have a series of negative consequences on the local economy, the vitality of the town centre and social wellbeing. For such reasons it is considered necessary to include a policy within the Local Plan: strategy and sites document that provides an up-to-date approach to determining planning applications involving existing or prospective leisure and tourism provision in the borough. The new policy will replace all of those relating to tourism in the Council's 2003 Local Plan.

6. Local Plan Policy Approach

- 6.1 As part of developing the Local Plan we have consulted at the following main stages:

- Regulation 18 Issues and options (October 2013) – which identified a range of issues and potential options for how we should plan for Guildford borough
- Regulation 18 Draft Local Plan (July 2014) – which outlined our preferred approach for planning for Guildford borough
- Regulation 19 Proposed Submission Local Plan (June 2016) – which included the policies and sites that we had intended to submit for examination
- Regulation 19 Proposed Submission Local Plan (June 2017) – a targeted consultation on proposed changes to policies and sites

- 6.2 Comments received as part of the consultation stages have been taken into account in the preparation of the Local Plan. The main issues raised in all four consultations, together with our response, is set out in the accompanying [Consultation Statement](#).

- 6.3 Policy E6 of the Proposed Submission Local Plan aspires to improve and diversify the leisure and visitor experience by:

- Supporting the provision of tourist attractions and leisure facilities in line with the NPPF's sequential approach. The exceptions test described in the NPPF will be applied to proposed leisure uses of 500sq m or more located outside the town, district and local centres.
- Supporting the provision of new visitor and business accommodation (including conference facilities) in line with the sequential approach
- Encouraging sustainable growth of the rural economy through appropriate leisure and tourism development
- Supporting proposals which promote greater use of the River Wey as a leisure and recreational resource without harming local biodiversity or water quality

- 6.4 The policy also seeks to ensure that development proposals respect and enhance the character of the built environment. Proposals involving the loss of existing

facilities will not be supported unless replacement facilities of an equivalent or better standard and provision are provided in a location equally accessible to the existing catchment population or it can be proved that the existing facility causes significant detriment to the amenity of its surrounding area. Alternatively, robust evidence must be presented which shows that:

- there is no longer a requirement for the facility; and
- the existing use is unviable and its retention has been fully explored (including through the marketing of the facility for its existing and an alternative leisure or tourism use for a period of at least 18 months prior to submission of a planning application)

Justification

- 6.5 Policy E6 is considered to be consistent with the relevant sections of the NPPF and the golden thread of sustainable development running through it. The policy supports the provision of enhanced and new leisure and visitor facilities in appropriate locations.
- 6.6 The development of new attractions and leisure facilities, including cultural centres and visitor and business accommodation in the borough, can help attract more visitors to Guildford. Achieving this outcome will provide various benefits to the borough associated with greater visitor spend. Stronger and more diverse tourism and leisure sectors can enhance the vitality and viability of our urban centres, improve the health and social wellbeing of residents and increase the overall prosperity of the borough.
- 6.7 Policy E6 outlines the sequential approach which will be applied to leisure and tourism development proposals in the borough. In doing so, the policy is consistent with the provisions of paragraphs 24-28 of the NPPF. Similarly, to remain consistent with the retail policies of the Proposed Submission Plan and the NPPF and retain the viability and vitality of the borough's town and local centres, a locally set threshold of 500sq m will be applied to leisure uses proposed outside of these areas. Developments proposing new leisure floorspace above this threshold in edge-of-centre and out-of-centre locations will be required to submit an impact assessment. The impact assessment must demonstrate the impact the proposed development will have on existing, committed and planned public and private investment in the centre or the catchment area of the proposal and the impact of the proposal on the vitality and viability of the town centre (up to five or ten years from when the application is made depending on the scale of the proposal⁵).
- 6.8 The policy also outlines the Council's support for new visitor accommodation in the borough, including in appropriate rural locations. This support is based on the evidence presented in the Surrey Hotels Future Study (2015) (regarding the need for greater visitor/business accommodation) and the Council's recognition of the visitor economy as a significant contributor to the borough's prosperity.
- 6.9 In supporting the provision of additional visitor and business accommodation, the policy aims to encourage more visitors to stay in the borough for a longer period of

⁵ NPPF paragraph 26, second bullet point

time; creating greater benefits to the local economy. Providing a mix of accommodation types will also help attract a diverse range of visitors to Guildford and broaden the borough's appeal as a visitor destination. The provision of new conference facilities will also maintain and enhance the borough's appeal as a host of large business events; creating further economic benefits and additional jobs for local residents.

- 6.10 Policy E6 of the Proposed Submission Local Plan supports the provision of small-scale development for leisure or tourism use in rural areas. This approach aligns with paragraph 28 of the NPPF and the goals set within the Council's Corporate Plan and Local Plan to strengthen the rural economy. 'Small-scale' development is defined in the policy, as elsewhere in the Plan, as constituting less than 100 sq m of additional floorspace; a figure based on conclusions drawn within the London Small Shops Study (2010)⁶. Proposals for leisure and tourism uses below this threshold in rural areas will not be subject to the sequential test.
- 6.11 To encourage the diversification of the rural economy and the provision of more hotels in the borough, the policy also supports the re-use of suitable rural buildings or the redevelopment of previously developed sites in rural areas for hotel accommodation. Mirroring the definition provided in the NPPG, 'suitable rural buildings' are identified as buildings of a permanent and substantial construction. Proposals for such development will only be approved where the need for the rural setting is clearly justified and, where possible and relevant, the development is supported by appropriate transport infrastructure and complies with green belt policy. Additional text has been added in this regards from the previous (June 2016) Proposed Submission Local Plan to emphasise that the appeal of some visitor accommodation, such as spa hotel, may predominately be based upon its onsite facilities and thus access to public transport will not be essential in such cases.
- 6.12 In line with the rest of the plan, Policy E6 requires development proposals to conserve or enhance the borough's special natural and historic environment. A number of visitor attractions in the borough are located in sensitive areas and it is our responsibility to ensure that future development does not result in the degradation of the borough's unique character. Nearly ninety percent of the borough is located within the Metropolitan Green Belt and a large proportion is designated as part of the Surrey Hills Area of Outstanding Natural Beauty (AONB). By requiring new development to protect and complement our natural environment and heritage assets, the policy will encourage a sustainable growth of the visitor economy and ensure that the borough remains an attractive place to visit, live and work in.

7. How has feedback received from the Draft Local Plan consultation informed the revised policy?

- 7.1 The Draft Local Plan was published for public consultation in June 2014 as part of the Council's requirement to meet regulation 18 of the Local Planning Regulations 2012. The Council received various comments from individuals, organisations and parish councils regarding the approach to leisure and tourism promoted in policy 14 (the previous name given to policy E6). These comments have been assessed and

⁶ London Small Shops Study (Greater London Authority, June 2010)

utilised to revise the policy for the Proposed Submission Local Plan. Changes derived from the consultation comments most notably include:

- The inclusion of the sequential approach for leisure and other main town centre uses
- Support for the protection of existing leisure and tourism uses to ensure that they are retained
- Support for proposals which make greater use of the River Wey as a leisure and recreational resource
- Greater emphasis placed in the supporting text on the role of the natural environment in attracting visitors to Guildford and ensuring that it is protected from inappropriate and harmful development

7.2 The amendments have ensured that the new policy E6 places greater emphasis on protecting the borough's existing leisure and tourism facilities and highlights how the Council will support the sustainable growth of both sectors. Policy E6 is also deemed to be more coherent with the National Planning Policy Framework and provides greater recognition of the local context than policy 14 of the Draft Local Plan.

7.3 In addition to the above, a small number of changes have been made to supporting text, policy wording and justification following the consultation responses received on the Proposed Submission Local Plan (June 2016). These changes are not considered to change the direction of the policy but have been added to provide further clarity and detail where deemed necessary:

- A sentence has been added within the supporting text to emphasise the importance of the borough's built environment in attracting visitors
- Extra sentences added to the supporting text to summarise how the Council intend to support the improvement and diversification of the leisure and visitor experience through the local plan
- Additional wording added to bullet point four of Policy E6 to caveat that proposals which increase the use of the river wey as a visitor and leisure resource will be supported where they and their associated users do not harm local biodiversity or water quality
- Additional wording added to the policy text to ensure that where a loss of visitor or leisure use is proposed, the existing facility has been marketed for its existing use and an alternative leisure or visitor use for a period of at least 18 months.
- Further text added to the justification section to emphasise the importance of the borough's natural and historic built environment in attracting visitors to Guildford
- Further text added to the justification section to reference the Surrey Hotels Future Report (2015) which highlights the hotel company interest and market potential in further visitor accommodation in Guildford and the increasing need for bed space.
- Further text added to the justification section as discussed in paragraph 6.10 above.

8. Conclusion

- 8.1 This topic paper outlines and explains how Policy E6 of the Submission Local Plan has evolved from the Council's evidence base, national policy and consultation comments received from the Draft Local Plan. The document is intended to provide background information and does not in itself contain any policies or site allocations.
- 8.2 By considering and reflecting national policy and guidance, the local context and public opinion, Policy E6 provides a strong strategic policy, which promotes the retention and sustainable enhancement of the visitor and leisure experience in our borough.

9. Next steps

- 9.1 The draft Local Plan strategy on Leisure and Tourism responds to the requirements of national policy and the results of our evidence. For more information please visit: www.guildford.gov.uk/newlocalplan.