

Examination of the Breckland Local Plan (2011-2036)

Matter 9 – Economic Development (Policies EC 01, EC 02, EC 03, EC 04, EC 06, EC07 and EC 08)

Question 9.14 Is the approach to tourism related development in Policy EC 07 justified and effective?



Cheffins Planning and Development
Clifton House
1 and 2 Clifton Road
Cambridge CB1 7EA
01223 271985

Matter 9 – Question 9.14

Matter 9 – Economic Development (Policies EC 01, EC 02, EC 03, EC 04, EC 06, EC07 and EC 08)

Question 9.14 Is the approach to tourism related development in Policy EC 07 justified and effective?

This additional statement has been produced by Cheffins Planning and Development on behalf of Goymour Properties Ltd and Banham Zoo. Banham Zoo is arguably the largest single tourist destination in Breckland, attracting over 200,000 visitors per annum to the zoo and an additional 100,000 to the car boot sales and caravan site. In addition, to visitors the zoo is also a regional centre for zoological research and conservation.

Whilst the intention of objective 7 of the Local Plan to provide a strong economy is supported, as detailed below there are concerns about the objective to “Promote and support economic growth in sustainable and accessible locations in a flexible manner, diversifying the urban and rural economic base of the District to enable a prosperous mix where investment is encouraged, skills are developed and retained and new and existing businesses are supported” This objective focuses on both the sustainability and accessibility of business locations and fails to recognise that some major tourism attractions are historic in terms of their location, which will reduce their accessibility to other modes of transport other than the private car.

Policy Gen 05 Settlement Boundaries also support tourism, but again the emphasis is on constraining development outside the defined settlement boundaries, with development being restricted to preserve the countryside.

The above demonstrates the failure of the Local Plan to recognise the importance of Banham Zoo and has not explained why the bespoke policy put forward for this site has been rejected with no comments as to why this has occurred. Paragraph 3.205 states that; *“Banham Zoo operates as a significant tourist attraction and local employer within the Parish. Applications for non-operational 'enabling' development which supports the retention, enhancement or expansion of these facilities will be considered in line with relevant strategic policies in this plan”*. Whilst this advice provides some comfort as to the importance of the Zoo, in reality due to the wording of the strategic policies and the sustainability appraisal underpinning these policies it will again be very difficult to actually provide a development which complies with them. This again emphasises the need for an individual policy to address the specific circumstances of the Zoo and its medium to long term development aspirations.

The proposition that *“Over the longer term (i.e. 20-year plan period), it is recommended that any new provision of office space follows an enterprise centre type model, with small units for small and medium enterprises (SMEs) and local start-ups and shared workspace and networking opportunities. It is also recommended that any new office space is focused upon Breckland's town centres, benefiting from a more attractive working environment and range of facilities for staff”* again is not only contrary to the aspirations of Banham Zoo but also conflicts with the development proposals in relation to Snetterton Airfield.

The NPPF (paragraph 28), requires that *“Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:*

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- *promote the development and diversification of agricultural and other land-based rural businesses;*
- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres;*
and
- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship”*.

The Local Plan advises that *“Proposals for the expansion of existing rural businesses, new businesses which are either related to rural activities (such as agriculture and forestry) or where there are clear sustainability advantages for businesses being located close to the market they serve, will generally be supported. The*

Matter 9 – Question 9.14

demonstration of sustainability advantages should include evidence of reduced need to travel, re-use of previously developed land or existing buildings and enhanced opportunities for rural communities to access employment in their locality. Such evidence should be professionally prepared and provided in a sustainability statement accompanying the proposal"

However, the sustainability appraisal in relation to EC07 (Tourism Related Development) conflicts with Paragraph 28 which states *"Both the preferred direction and the alternative option recognise the importance of tourism for Breckland's economy and support its development, in this regard both the policy options score well against sustainability objectives relating to the local economy. The preferred direction is more supportive of smaller scale developments within the rural area than the alternative option, which sought information around the facility it would sustain"*. It is clear that Policy EC07 has been predicated on the basis of supporting smaller scale development, which does not recognise the significance and uniqueness of Banham Zoo.

The findings of the sustainability appraisal also conflict with criterion b of Policy EC04 in that *"Proposals for employment uses outside of the identified General Employment Areas and allocated sites will be permitted where:*

b. There are particular reasons for the development not being located on an established or allocated employment site including:

- 1. The expansion of an existing business;*
- 2. Businesses that are based on agriculture, forestry or other industry where there are sustainability advantages to being located in close proximity to the market they serve; or*
- 3. Industries and / or businesses which would be detrimental to local amenity if located in settlements, including general employment areas.*

c. The development of the site would not adversely affect the type and volume of traffic generated".

Banham Zoo's location is historic and due to this it is very difficult to manage the type and volume of traffic produced. The implications of the policy framework surrounding employment and tourism development creates considerable uncertainty as to how the expansion of the zoo and its associated facilities will be viewed and make it very difficult to plan for expansion as detailed in the bespoke policy which was submitted as part my client's representations

The introduction to Policy EC 07 (Tourism Related Development) is welcomed in that *"The creation, enhancement and expansion of tourism attractions, and tourism infrastructure will be supported in accordance with the development strategy where this would enhance the existing tourism offer, benefit the local economy and be of a suitable scale and type for its location"*.

However, the comments that *"Development of an appropriate scale should be located where the environment and infrastructure can accommodate the visitor impact. Where a proposal is not readily accessible by public transport, then it will be supported where it relies on a specific geographical resource or contributions are made to improve accessibility"* are clearly aimed at Thetford Forest rather than Banham Zoo. The criterion that *"Leisure, tourism and cultural development proposals and visitor accommodation attracting a significant number of visitors should be located within, or be accessible to, the five market towns"* is of particular concern and a visitor attraction such as Banham Zoo would fail to comply with this requirement and confirms the difficulties in complying with and meeting the strategic policies of the plan. This also raises concerns as to the validity of the comments made at Paragraph 3.205 in that *"Banham Zoo operates as a significant tourist attraction and local employer within the Parish. Applications for non-operational 'enabling' development which supports the retention, enhancement or expansion of these facilities will be considered in line with relevant strategic policies in this plan"*

The sustainability appraisal in relation to Policy EC 07 emphasise these concerns in that *"The policy allows for tourist related development across the district, whilst the focus for major schemes is on the market towns, smaller scale development is acceptable across the district subject to scale and type. Whilst, the effect on this objective will be dependent on the particular site, due to the limited quantum of brownfield land across the District it is likely that most development will occur on undeveloped land.*

Matter 9 – Question 9.14

Tourism and tourist related employment is a key sector within Breckland's economy. The policy supports the sustainable development of tourist facilities within the District. The preferred direction supports smaller scale tourism development across the district".

It is clear that the policy basis for tourism development has been formulated on the basis of the towns being the focus for tourism development, with the scale and form of development outside these areas being limited. However, Banham Zoo with 300,000 visitors and 150 employees is clearly a unique facility and that a bespoke policy is provided to make the plan sound. The proposed wording of this policy is detailed below and has been amended to relate to the policies of the submission local plan, whereas the original policy was based on the Core Strategy.

Suggested Banham Zoo policy

"Breckland Council recognises the importance of Banham Zoo as a major visitor attraction and will support the growth of sustainable tourism at Banham Zoo in line with Policy EC 07 and where this does not conflict with other Local Plan policies.

The District Council will work with the trustees and operators of Banham Zoo to formulate a comprehensive masterplan and development brief which seeks to enhance and expand the existing zoo in a sensitive manner, to include:

- *A new zoo entrance feature*
- *Incubation business units to complement the A11 Innovation Corridor and reinforce links between the zoo and the wider region*
- *Expansion of the holiday village using eco-lodges with the emphasis on ecology and sustainability*
- *Germinal Habitat Dome – a spectacular tourist attraction with a unique combination of tropical environments and animal habitats*
- *Provision of retail improvements to provide viable long term local facilities for both residents, employees and visitor*
- *Provision of enabling development to assist in the funding of improvements to the zoo, and*
- *Formulation of a detailed access strategy, including measures to reduce reliance on the private car.*

The objective of this policy is to not only make Banham Zoo a regional tourist attraction but also an important educational and business facility focused on the innovation associated with the Zoo's research and conservation operations"

In the view of the above the Inspector is asked to consider the special circumstances of this facility and support a policy which will allow this facility to grow and become a centre of zoological excellence as well as remaining as a major tourist destination. This policy will also ensure that this aspect of the plan is sound.