



Topic Paper:  
**Tourism**

Regulation 18 Consultation on the Draft Local Plan  
December **2020**



Dover District **Local Plan**  
Supporting document



# 1. Introduction

- 1.1 In 2018 Dover District Council started work on a Local Plan Review. The new Local Plan 2040 aims to be aspirational and deliverable, with clear, unambiguous policies. It will provide a positive vision for the future and will address the housing needs and economic, social and environmental priorities of the district covering the period to 2040.
- 1.2 Preparation work has been undertaken in accordance with the requirements of the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment Directive (European Directive 2001/42/EC as transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive), the National Planning Policy Framework (NPPF) 2019, National Planning Practice Guidance and the local context and evidence base. The Planning Advisory Service (PAS) Local Plan Route Mapper Toolkit 2019 has provided useful guidance throughout.
- 1.3 In order to inform the Local Plan Review process, which includes a review of existing local plan policies, an extensive programme of stakeholder engagement has been undertaken. At the start of the review process a series of workshops was organised to gather initial thoughts on a vision, objectives and policies for the District and to re-examine the Council's land allocation process. The focus of these workshops was on a fully participative process with a wide-ranging group of invited stakeholders. One of the key overarching aspirations that came out of such early consultation exercises was a desire for a more streamlined Local Plan, with, for example, supporting text in the document kept to a minimum. As a result, it was decided that much of the background evidence and other contextual information which support the policies within the Plan will be set out in a series of Topic Papers. This evidence will then be summarised succinctly in the text of the Plan itself. In this way the Local Plan 2040 will be easy to use and accessible to all users of the planning system in the district.
- 1.4 This Topic Paper is one in a series that set out the policy context and evidence base that has informed the preparation of each of the chapters of the Dover District Local Plan 2040, Regulation 18 Draft. Each Topic Paper presents the relevant national and local planning legislation, policy and guidance as well as other background information, including stakeholder engagement outcomes, monitoring of usage of existing policies, that forms the evidence base for the relevant section of the new Plan. For further information on individual pieces of evidence, links are provided to the full documents as appropriate.
- 1.5 The information in the Topic Papers will be updated as and when necessary and will form a key part of the Local Plan Evidence Base that will be relied on at the Local Plan Examination.

1.6 The issues covered by this Tourism Topic Paper are as follows:

#### Background

- Tourism's contribution to the Local Economy
- Visitor Accommodation
- Visitor Attractions

#### Evidence Base

- Policy Context – National, Regional and Local
- Usage of existing Dover development plan policies
- Stakeholder Engagement and Feedback
- Sustainability Issues

#### Conclusions

- Local Plan 2040 preferred policy approach

# Background

## 2. Tourism in Dover District: Context

- 2.1 The Dover Strait is one of the world's most important and busiest seascapes and the town of Dover's location at the narrowest point of the English Channel places the district at the centre of surface travel to and from continental Europe. It is home to one of the world's busiest ports, catering for roll-on roll-off freight and passenger traffic, cruise liners and private boats. As a visitor destination the strength of the district is rooted in such a location.
- 2.2 Alongside its strategic location the tourism appeal of the district is strengthened by a rich archaeological and historical heritage of international importance, including the three key towns of Dover, Deal and Sandwich and its many villages. It is home to two of the most iconic of the nation's tourist sites - the White Cliffs and Dover Castle. Such built heritage sits in highly attractive landscapes, which adds to the visitor appeal of the district. The magnificent and iconic chalk cliffs along an extensive stretch of the district's coastline form one of Britain's most evocative and best-known landmarks. For many they are the first sight of Britain and afford excellent and popular views across the sea to France. Behind the cliffs is a landscape of open downland and arable farming, including large areas of internationally protected wildlife sites and the chalk grasslands of the Kent Downs AONB.
- 2.3 The Council has produced a new Visitor and Tourism Strategy *Destination White Cliffs Country: growth strategy for tourism and the visitor economy 2020 to 2030* (2020). This forms a key part of the Local Plan evidence base. It sets out ambitious targets, capitalising on the growth potential of tourism for the local economy and building, in particular, on the potential offered by the district's geographical location. It reflects recognition by the Council that the visitor economy, visitor experiences and tourism are increasingly important catalysts for social, economic and physical regeneration across the district. Specifically, it aims to encourage investment in the tourism industry, attract new providers and increase the number of staying visitors year on year, to increase visitor spend per trip, to improve infrastructure and to facilitate the provision of new hotels, restaurants attractions and business and marketing centres.

### Contribution to the Local Economy

- 2.4 The tourism industry is a major contributor to the local economy with 17% of all employment in Dover District either tourism or visitor based<sup>1</sup>, supporting 6,071 jobs in 2019. The total value of income derived from tourism in the district is £302

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<sup>1</sup> *Destination White Cliffs Country: growth strategy for tourism and the visitor economy 2020 to 2030, Executive Summary (page 41)* Dover District Council (2019)

million annually, with the average spend per visitor making an overnight trip worth seven times more to the local economy than that of a day tripper.

- 2.5 However, although both the strategic location and the District's rich natural and historic environments attract many millions of people to Dover each year, only a very small proportion choose to stay in the District (In 2019 there were 4.7 million visitors, of which only 424,000 were staying visitors<sup>2</sup>). This is a situation which the Council is working hard to improve.

### **Visitor Accommodation**

- 2.6 Visitor accommodation in the District is heavily dominated by the self-catering market (66%) with serviced accommodation (Bed and Breakfasts and hotels) accounting for just 24% of accommodation stock. Dover District currently has no 5\* rated hotels and only two 4\* AA rated hotels. Given its strategic location providing the country's quickest surface link to continental Europe this is considered to be one of the causes of the under-achievement of the tourism potential of the district identified in the Dover Core Strategy (2010)<sup>3</sup>.
- 2.7 Locate in Kent and Visit Kent, alongside Dover District Council, are therefore currently working together on a joint initiative to remedy the perceived shortage in the supply of quality hotel stock available to visitors – especially 4 and 5 star accommodation encompassing food and drink, large scale conference or event space facilities. This reinforces the findings of the National Coastal Tourism Academy (England's Coast Project) that one of the common major challenges that many coastal regions face is the lack of large volume, quality accommodation that will meet the high demands of domestic and international business and leisure markets.

### **Visitor Attractions**

- 2.8 White Cliffs Country has over 100 recognised visitor attractions, including Dover Castle and Wingham Wildlife Park. The majority of attractions are history and heritage focused, supported by leisure and activity as well as culture. In 2017 attractions saw an economic impact value of over £12 million for the district.
- 2.9 Walking is recognised as the district's top visitor activity<sup>4</sup>. Dover District currently offers 30 trails and routes, including two National Trails which run through the District - The North Downs Way National Trail which runs for 153 miles from Farnham on the Surrey Hampshire border to Dover, and The England Coast Path (in compliance with the Marine and Coastal Access Act 2009.) This new walking

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<sup>2</sup> *Economic Impact of Tourism White Cliffs Country (Dover District) 2019 results*, Visit Kent (November 2020)

<sup>3</sup> *Dover District Local Development Framework Core Strategy (paragraph 2.45)* Dover District Council (2010)

<sup>4</sup> *Destination White Cliffs Country: growth strategy for tourism and the visitor economy 2020 to 2030, Executive Summary (page 45)* Dover District Council (2019)

route when completed will run the length of the national coastline. The section through Dover District has been completed and runs from Pegwell Bay, down the Stour estuary to Sandwich before returning to the coast and onwards to Capel-le-Ferne. The district is also home to nine different themed cycle routes and cycling trails. These include sections of National Cycle Routes 1 and 2 as well as National Cycle Network Routes 16 and 17.

## Evidence Base

### 3. Policy Context

#### National

##### **EVIDENCE BASE**

National Planning Policy Framework (2019) paragraph 83 and 98

UK Tourism Action Plan 2016

UK Tourism Sector Deal 2019

The UK Industrial Strategy 2017

National tourism initiatives eg The England Coast Path

- 3.1 Paragraph 83 of the National Planning Policy Framework (2019) recognises the role of tourism in building strong and competitive economies, including sustainable rural tourism and leisure developments which respect the character of the countryside. Paragraph 98 of the NPPF advises that planning policies should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.
- 3.2 In August 2016, the government published the UK Tourism Action Plan. The plan includes a series of new initiatives and measures to help Britain out-compete other major tourism destinations, welcoming more visitors and encouraging staycations with residents holidaying at home. The new initiatives include the restructuring of Visit Britain and Visit England and the announcement of the £40 million Discover England Fund, boosting apprenticeships and attracting more people to careers in tourism and making it easier for visitors to explore by rail, bus and coach.
- 3.3 The UK Industrial Strategy and the UK Tourism Sector Deal both build on the Tourism Action Plan. They set out how the government and the tourism industry will work in partnership to boost productivity develop the skills of the UK workforce and support destinations to enhance their visitor offer. These form the

basis of the Council's Growth Strategy for the Tourism and Visitor Economy 2020 to 2030.

- 3.4 There are many national tourism initiatives that affect this district. By way of example, the England Coast Path is a new walking route that will follow the entire coast of England providing right of access around the entirety of the open coastline. This includes, where appropriate, any land, other than the trail itself, which forms part of the Coastal Margin. The path is being opened in sections and will, when completed, be one of the longest coastal paths in the world. This project will improve coastal access around the entire Kent coastline in accordance with the Marine and Coastal Access Act 2009. The first stretches of the England Coast Path in Kent were officially opened on 19 July 2016 between Ramsgate and Camber Sands which includes the entirety of the coastline of Dover District. This section of England's newest national trail provides 66 miles (106km) of access past some of the district's finest landscape and historical landmarks and is one of the many walking routes in the district which contribute to the popularity of walking here.

## Regional

### EVIDENCE BASE

*Kent Downs Area of Outstanding Natural Beauty Management Plan 2020-2025, Kent Downs AONB Management Unit*  
*The EKLSP Sustainable Community Strategy, East Kent LSP (2009)*  
*East Kent Local Investment Plan 2011-26, East Kent LSP (2011)*

- 3.5 The Kent Downs AONB Management Plan acknowledges the pressure that tourism places on the protected landscapes of the AONB. Given its location close to major centres of population and ease of access given the presence of two motorways and a number of railway lines including High Speed 1 running through the AONB, estimated day and staying visitor numbers are high and increasing. The Management Plan 2014-2019 does not contain specific tourism sector policies but does provide policies to protect the characteristics and intrinsic qualities of the AONB acknowledging that visitor pressure can be very high and unevenly distributed for particular countryside routes, sites and areas.
- 3.6 The East Kent Local Strategic Partnership (LSP) Sustainable Community Strategy sets out the clear, long-term vision for the authorities of East Kent, including Dover District. The Strategy's vision is that "By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities". The specific objectives of this strategy include that "by 2030: The revival of East Kent's coastal resorts and the integrated marketing of its attractions will have

boosted visitor numbers, average expenditure and length of stay, supporting an additional 10,200 jobs in the tourist economy”.

- 3.7 The East Kent LSP has also produced a Local Investment Plan for the period 2011-26. This outlines the scale and focus of investment and support required to deliver a programme of projects that will deliver the East Kent Sustainable Communities Strategy’s vision and priorities. Economic prosperity and job creation is at the heart of the East Kent vision. This will include rebalancing the economy through nurturing both new investment and existing businesses and by making sure innovation and enterprise go hand in hand. East Kent Partners have identified 8 strategic spatial priorities, three of which apply to Dover District and focus on regeneration initiatives at Dover Port, Dover Waterfront and Dover Town Centre, the upgrading of the A2 corridor and enhanced delivery at the Whitfield urban extension.

## Local

### EVIDENCE BASE

Dover District Council Corporate Plan 2020 - 2024

*Destination White Cliffs Country: Growth strategy for tourism and the visitor economy 2020 to 2030* Draft Dover Visitor and Tourism Strategy (2019)

Dover Coastal Communities Team Economic Plan 2017-2021

Deal and Sandwich Coastal Communities Team Economic Plan 2016

- 3.8 The Dover District Corporate Plan 2020 – 2024 is the main strategic document of the Council, providing a framework for the delivery of its services and a clear statement of the Council’s vision and priorities. It provides the context for all other Council strategies and plans. The Corporate Plan identifies the ongoing commitment to the regeneration of the district, both physical and social, and also emphasises the importance of tourism in realising the opportunities for the district and economy. This Plan highlights the focus on Dover Town as the Gateway to the UK/Europe and as a benefit to the whole district.

- 3.9 Of the four Corporate Objectives the first is Regeneration - Tourism and Inward Investment:

**Providing a clear vision and direction of place-shaping for the district, creating a vibrant destination with good transport links, making tourism everyone’s business. Supporting the business community to enable a thriving local economy that provides the jobs, services, training and career opportunities that we need.**

- 3.10 Reflecting the commitment to and the importance of growing the tourism economy, the Council has produced its first Tourism Strategy. *‘Destination White*

*Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030* is the framework for the development of tourism in the district over the next 10 years. It is fully aligned to the objectives of Dover District Council's Corporate Plan, and the Local Plan, and reflects the priorities and aims of the Government's Industrial Strategy and the Tourism Sector Deal. The Strategy sets out a challenge for the district's tourism sector to achieve stronger economic and employment growth. Over its 10-year lifetime, this Strategy aims to stimulate market growth and investment, create jobs, and increase overnight trips and visitor spend in the area, achieving such growth in a sustainable way that balances the needs of residents, visitors and the environment. The Strategy adopts the five strategic pillars of the Government's *'Tourism Sector Deal'* and *'UK Industrial Strategy'* as its core themes namely: Ideas, People, Place, Business Environment and Infrastructure.

- 3.11 With regard to the emerging Local Plan one of the key objectives of this Tourism Strategy is the upgrade in tourism infrastructure. The Strategy aims to connect the towns, attractions, accommodation providers, businesses and assets of what it terms 'White Cliffs Country' for the benefit of all, ensuring value growth by converting day visits to overnight stays. To achieve this objective, the Strategy focuses on increasing the quantity, quality and range of visitor accommodation stock, with a focus on supporting investment and improvements, rural/farming diversification of business use, new large 4\*/5\* hotel developments and increasing the quality and range of our visitor attraction stock with a focus on supporting investment improvements and new developments.
- 3.12 There are two Coastal Community Teams in the district comprising relevant stakeholders from the public and private sectors. The Dover Coastal Communities Team Economic Development Plan focuses on transforming tourism by shifting the focus from transit to destination, capitalising on the 13 million passengers who pass through each year, and maximising the High Speed rail links with London. It aims to achieve this by working to restore and revive an exceptional range of heritage assets, alongside initiatives aimed at improving access to, connectivity between, and promotion of, key attractions. The aim is to increase visitor numbers, length of stay and spend. The Team will support initiatives to bolster high street performance and adapt to changes in shopping habits with the aim is to re-establish the high street as a leisure destination. Improved public realm and way-marking will encourage visitors back to the high street. This will include a new Heritage Quarter and improvements to the riverside walk along the River Dour flowing through the town. Finally the plan creates opportunities for people to learn new skills, including the development of a national centre for heritage skills to support the restoration and revival of built heritage.
- 3.13 The Deal and Sandwich Coastal Community Team's Economic Plan's objectives are to develop new employment opportunities, improve skills and create vibrant town centres, with thriving high streets linked to attractive promenades, seafronts and riversides. Specifically, and in the context of background to the emerging Local Plan, this Economic Plan supports a protected future for heritage assets,

first choice year round destination for a diverse range of visitors, and the creation of vibrant and 'living' town centres.

## 4. Usage of Existing Policies

- 4.1 The following are the current tourism policies from the saved Dover Local Plan 2002. These are to be used when tourism issues are a relevant factor in the determination of planning applications:

LE30 Caravan Sites  
LE31 Holiday Chalet Sites

- 4.2 There is no evidence that these policies are in frequent use.

## 5. Community Engagement

### Feedback from 2018 workshops

- 5.1 As part of the preparation of the Regulation 18 Draft Dover District Local plan 2040 a number of stakeholder workshops and consultation events have been held. These have provided valuable feedback which will be fed into the preparation and drafting of policies.
- 5.2 In 2018 three workshops were held to scope early thoughts on what the next iteration of the Local plan should focus on. With regard to tourism the following key findings emerged:
- Encourage people to stay in the District rather than pass through
  - Increase the tourism marketing budget
  - Maximise open golf - re-brand as '*destination golf*', not just about the 'Open'
  - Enhance visitor experience to Sandwich, for example open golf (parking etc.)
  - Harness tourist opportunities in Dover
  - Promote tourism in an integrated way
  - Enhanced tourism (esp. at Port)
  - Encourage longer-stay tourism

## 6. Sustainability Issues

- 6.1 In 2017 Dover District Council commissioned LUC to carry out the Sustainability Appraisal incorporating Strategic Environmental Assessment (SEA) of the new Local Plan for Dover District (The Dover Local Plan 2040). This process is designed to consider and communicate the significant sustainability issues and effects of

emerging Plans and Policies, including their alternatives. It informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid or at least minimise the potential for adverse effects.

6.2 The 2018 Scoping Report<sup>5</sup> provides the context for, and determines the scope of, the Sustainability Appraisal/SEA of the review of the Local Plan and sets out the framework for undertaking the later stages of the SA/SEA. The Scoping Report starts by setting out the policy context of Dover Local Plan 2040, before describing the current and likely future environmental, social and economic conditions in the District. This contextual information is used to identify the key sustainability issues and opportunities that the New Local Plan can address. The key sustainability issues and opportunities are then used to develop a framework of SA Objectives used to appraise the likely significant effects of the constituent parts of the Local Plan, including strategic policies, site allocations and development management policies.

6.3 Tourism is not a direct theme of this SA work but is implicit across a number of themes, including the local economy, landscape and the historic environment. With regard to these three themes the key sustainability issues facing Dover are identified in the SA Scoping Report as follows:

- Job density in Dover District will continue to lag behind other Kent districts without coordinated action in the Local Plan to promote regeneration of its town centres, improve the prosperity of the rural economy and the provision of appropriate employment space, specifically B2 and B8 uses.
- The Local Plan Review offers an opportunity to capitalise on the regional investment in the A2 Corridor and Dover Port, Waterfront and Town Centre by diversifying and expanding the District's employment areas industrially and geographically to provide equality of access and opportunity.
- Uncertainty exists over what the economic impacts of Britain's exit from the EU in 2019. The Local Plan Review will need to offer sufficient flexibility to respond to these uncertainties.
- The district contains a number of distinct rural landscapes which could be harmed by inappropriate development. The Local Plan offers an opportunity to ensure that designated landscapes (such as the Kent Downs AONB and Special Landscape Area) are protected and enhanced as appropriate and that development outside these designations is sited and designed to take account of the variation in landscape character across the District.
- There are many sites, features and areas of historical and cultural interest in the District, a number of which are at risk, and which could be adversely affected by poorly planned development. The Local Plan provides an opportunity to conserve and enhance the historic environment as well as improve accessibility and interpretation of it.

6.4 In this regard, the likely significant effects of the constituent parts of the Local Plan will therefore be assessed against the following SA Objectives:

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<sup>5</sup> Dover District Council New Local Plan, Sustainability Appraisal Scoping Report, LUC (February 2018)

**SA 3: To deliver and maintain sustainable and diverse employment opportunities.**

**SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.**

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside.**

## Conclusions

### 7. Preferred Local Plan Policy Approach

- 7.1 The Regulation 18 Draft Local Plan will encompass policy within the Local Economy chapter to help boost and support the tourism sector, given the important role that the visitor economy plays here in Dover District.
- 7.2 There are two options regarding the approach that the Plan could take in this regard. It could either allocate specific sites and promote tourism uses and holiday accommodation in specific locations. Or, it could include a criteria-based policy supporting new tourism facilities and accommodation. The preferred policy approach is the latter; to provide a more flexible criteria-based policy which supports the provision of new tourism facilities in suitable locations. This is considered the best way of providing support for the overarching Tourism Strategy of the council.