

EXAMINATION IN PUBLIC

CUMBRIA AND LAKE DISTRICT JOINT STRUCTURE PLAN

Held At:

Lake District National Park Authority
Murley Moss
Oxenholme
Kendal LA9 7RL

Panel Members:

Panel Chair:	ADRIAN SMITH
Panel Member:	SIMON GIBBS
Panel Secretary:	FRANK HEWSON

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Employment Development in Rural Areas
Tourism Development

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(Introductions made)

THE CHAIRMAN: I turn to today's morning issue and circulate quite a brief agenda. We just have two questions to look at this morning. Certainly my hope and intention was that we should finish this session by the coffee break, and then switch to tourism as our second topic. The first question is, does the plan give sufficient emphasis to economic development in rural areas. The policy we are looking at is policy EM 12, which in the brown document is on page 30. I shall also be referring a little bit to RPG13, Policy RU2, which in the March 2004 edition is on page 71.

AUTHORITIES: Could I qualify it is actually policy EM14 in the structured land proposed changes?

THE CHAIRMAN: Yes, thank you. Just a few introductory words, just to set the context for economic development in rural areas. We have already spent some time looking at economic development generally last week, and also the ST policies, and the context for economic development in rural areas is set by policies ST5, which directs most development to key service centres, many of which are small towns, market towns and large villages in the rural area, and ST6, which deals with the rest of the county outside of the key service centres, and that policy allows small scale developments in towns and villages which will be identified later in local plans or local development documents.

ST6 says: "Development in the open countryside will be exceptional. Policy EM 14 provides the context for that exceptional development, which may be permitted to take place outside the key service centres, and there is a paragraph at the end which we will come on to in the second question, which limits that development as far as new build is concerned, in a way we will look at later on.

So that is the context. It has to be seen obviously in the framework of the ST policies. But the first question, which I have outlined already, is a broad introductory question to find out whether or not, in your view, policy EM14 is sufficiently facilitating in terms of economic development and is in line with regional planning guidance in RU2, and maybe also to a certain extent to PPS7, which is the national policy framework, which also deals with economic development in rural areas. So, is the policy sufficiently facilitating? Does it pick up the message in RPG13 and follow that through effectively into the Cumbrian context? Does anybody want to come in on this first broad question; is it sufficiently facilitating?

RURAL REGENERATION CUMBRIA: I am speaking on behalf of Rural Regeneration Cumbria this morning, of which I am a director. I think we are all aware that after foot and mouth the Rural Regeneration Cumbria was set up as a delivery organisation for a number of key issues, to rectify the vulnerability we had to foot and mouth and to actually improve the economic performance and GVA of Cumbria. A document was produced called Next Steps, of which the Lake District National Park and all the districts, and probably everybody sitting round the table here today, participated in as well.

That set out clear targets and objectives for rural works base, through employment, along with a lot of other objectives and targets and environmental improvement and farm diversification. They are pretty ambitious targets. The amount of floor space to be created in rural areas is considerable, and the number of new jobs to be created is also considerable.

When you look at the policy that we are looking at this morning, it does seem to me -- and I am not a planning specialist -- that under planning guidance of the RPG13, employment land and employment opportunities should be need based, and it does appear to me that not a lot of analysis and research has been undertaken of the need of employment uses and industry within rural areas. I can't see, number one how that need has been identified and the research has been done, and identified within the structure plan. Surveys and research has been undertaken. There is an audit of rural works base prepared for the Northwest Development Agency, done in June 2003, which clearly comes to conclusion for Cumbria that there is a huge lack of provision in the deeper rural areas. The words are: "Lack of provision in the deeper rural areas works base is pronounced".

So I fail to see how we can possibly either achieve the targets in Next Steps, which were participated in by the National Park Authority and the organisations round the table, by not allocating spaces for industrial or employment use outside settlement boundaries, and I could say it is a little bit disappointing that within the National Park, and it depends on key service areas, that employment land has not been allocated for employment prospects and development within what could be key service areas and may become key service areas. So definitely I think we are not going to be able to achieve the targets set out in Next Steps unless we target land outside key service areas or allocate land outside settlement boundaries.

THE CHAIRMAN: Thank you. I just want to check we have the two documents you refer to in the library, and I am asking Frank to check that out. We will come back to that in a minute. The first one is called Next Steps?

RURAL REGENERATION CUMBRIA: It is Rural Action Zone, Next Steps.

THE CHAIRMAN: And the second document you referred to as an audit of rural works base. Does that have a specific title?

RURAL REGENERATION CUMBRIA: Just an audit of rural works base in the northwest of England final report, commissioned for the Northwest Development Agency. The National Park do have a copy of it because they were present in the presentations of it, and have been party to the consultation leading up to its final presentation.

THE CHAIRMAN: Thank you. I have not actually seen either of those documents. We will see if we can track them down. I will come back to you if we need to introduce those into the library. Northwest Development Agency made a similar point to the one Mr Brockbank is making. They made it in the context of the regional rural recovery plan, which I have here and have seen. So in the absence of Mr Gallagher I turn to Mr Bamber, and ask if you share some of the concerns Mr Brockbank has expressed, perhaps particularly in relation to this document, which

again sets out a fairly broad ranging agenda for the rural area, as now much of this is not specifically to do with planning, but it does set some items for planning in a rural context.

Mr Bamber, do you share the concerns Mr Brockbank has been expressing?

GONW: I am in a certain amount of difficulty. It is actually Development Agency's objection that you are quoting, and they are not here.

THE CHAIRMAN: Not so much an objection, I think it was more just a general point in relation to that.

GONW: Indeed. We have not objected to this policy because we did not see it as being inconsistent with regional and national guidance, which does not mean to say it could not be improved, of course, on the basis of what people have said or will say in representations. There is nothing in Rural Renaissance which implies that there is a need for new buildings, for new enterprises in the open countryside, and I think perhaps people who are objecting to the policy -- personally I would find it helpful to understand where they are coming from. As I understand it, Mr Brockbank is saying there is a need for that, new enterprises in new buildings in the open countryside, which can't be served and are adjacent to settlements. Also I am not quite clear what is meant by the deeper rural areas, and I have not seen the Next Steps either.

So just a few references to policy. RU2: Stresses development in key service centres. It allows for "development or conversion of premises in villages" -- which implicitly is other villages not key service centres -- "conversion of farm and other rural buildings for appropriate purposes in scale with their rural location. PPS7, paragraph 3 says: "Planning authorities should focus most new development in or near to local service centres, and that planning authorities should set out in local development documents", this is paragraph 4, "their policies for allowing some limited development in or next to rural settlements that are not designated as local service centres."

There is nothing in either of those documents which implies approval for new building in the open countryside to serve new enterprise. Plus, when you are talking about farm diversification that may be a different matter. So it is a matter of defining the need really, because of course there are a good number of key service centres, and it is up to Local Authority districts to define local service centres, of which there are probably several dozen across the county. That is the big question. Why is there a need for more than that, I would suggest?

THE CHAIRMAN: Thank you. I would like to leave the question of new build to later. That is the second point and we will come back to that. That is a specific point. I am really just at the moment, in relation to the first question, wanting to focus on the general messages in the plan. I think you did have a point about new buildings but I think you had a general point, Mr Brockbank, about the extent to which the plan facilitated or emphasised the importance of rural development.

RURAL REGENERATION CUMBRIA: Yes, I would agree that we need to define the need. The need does not seem to have been researched or identified. The Next Steps strategy implemented the regional renaissance at the local level. And that writes

the targets and the objectives of diversifying our rural economy. So on a general point there is no way that without greater emphasis, number one on identifying the need the work has not been done but some of the work exists but also, number two, is also how you then provide the infrastructure that has been identified in Next Steps.

THE CHAIRMAN: I will come back to Mr Fairlamb in a minute to put the issues, specifically the issue of need and how that identification need works its way through into the planning framework. First I would like to bring in Mr Barden.

BARDEN PLANNING CONSULTANTS: I think it reasonably reflects an accommodating approach in principle, but then, as so often, there is almost a backing off so that the policy states that there will be support, but then it goes on to say "in particular certain things will be encouraged", and there is an inclination to read those as being they are effectively the only things that will be encouraged, and it seems to me that because the policy itself is more general in its form, those four criteria ought simply to be in the text, because they are saying these sort of things will be encouraged, but the policy itself is simply encouraging the wider activity that need not necessarily be one of those four criteria. My experience is that when you stick a load of criteria at the end of a policy, people try to trip you up on those criteria, and they would be better in the text not in the policy.

There is a second point, which is that ST 6 as it now is, talks in terms of "small scale development helps sustain local services, meets local needs or supports rural businesses, whether permitted in towns and villages as defined by local plans". Mr Bamber just read to you extracts from a number of documents, including PPS, which talks in terms of "within and adjacent to or next to", and it does seem to me, on the basis of past experience, that finding suitable sites for employment purposes within these smaller rural settlements, and in particularly in all the settlements within the Lake District National Park, has proved pretty well impossible, and you will often have to look on the edge if you are going to have a site which one might be available and two would be suitable.

The experience of the Lake District National Park, for instance, is that a number of what we would now describe as brownfield sites were allocated in their local plan, and that they all have tremendous difficulties, poor access, bad shapes, contamination, which has led largely to them being undeveloped and not really been encouraging a diversification of the economy in the National Park. I think, allowing for things on the outer settlements gives much greater scope and is realistic in practice.

MR GIBBS: So your particular suggestion is that 1, 2, 3 and 4 come out and the content is there but just in a paragraph.

BARDEN PLANNING CONSULTANTS: Yes, that's right. It seems to me the policy should be the fundamental policy which says: "We will do these things". You might want to say somewhere in the document: "In particular we would like these things to happen". You put that in the text. If you put them as a list in the policy they are intrinsically led as criteria that you have to meet.

THE CHAIRMAN: Thank you. I would like to bring in

Mr Fairlamb and also ask him to address this issue of the extent to which development on the edge or adjacent to settlements can be taken into account, but before that I want to explore a little bit further the moving of the criteria which you raise, because I think Allerdale Council made a similar point. Is that correct. Would you support that approach as well?

ALLERDALE BC: I don't remember making such a point, sir.

THE CHAIRMAN: Well, I certainly picked it up from somewhere and I put your name next to it. Anyway, regardless of that, would you support that approach?

ALLERDALE BC: I, being a planner, would prefer to have criteria specified in a policy. I appreciate that occasionally that can open a can of worms, but I prefer to see them in the policy itself.

MR GIBBS: That assumes that they are criteria. The point Brian Barden was making is that if they are introduced by, and in particular that suggests that they are not things that you have to meet, they are instances of what might be suitable, and by giving them 1, 2, 3, 4 you are creating a degree of confusion as to whether or not they are criteria. That is what I hear Brian Barden to be saying. I think he is not disagreeing with me. I think that is what you are saying, is it not, Mr Barden?

BARDEN PLANNING CONSULTANTS: Yes, it is.

MR GIBBS: That actually as written they are not criteria but because they are as presented they look like criteria?

BARDEN PLANNING CONSULTANTS: Mr Evans admirably demonstrates my point. He immediately read them as criteria and discussed it in that context. That is what I am saying. If you put them in there, people will regard them as criteria, and when applications are made people will be saying: "Ah, you're not one of these four. You are not, therefore, welcome". That is not what the policy says, and no doubt in a proper forum one could argue that, certainly in front of an inspector, but with the local planning authority one might not be as successful in arguing that, and it seems to me it would be a lot better to put them in the text.

THE CHAIRMAN: Thank you. I think actually I read them as criteria as well.

MR GIBBS: I wouldn't say "in the text". You mean within a paragraph in the policy, or are you meaning in the supporting text?

BARDEN PLANNING CONSULTANTS: Within the supporting text you would say the type of things you would be looking to, to encourage and welcome that is legitimate in the text, which is supporting the policy itself. But we have had certainly an inspector saying he read them as criteria as well. It seems to me that is exactly the point and that is the exactly the way these things have happened in the past with other criteria. In the last structure plan, about tourism and similar things, experience shows you put things in there, people say they are criteria.

THE CHAIRMAN: Can I bring Mr Evans back in.

ALLERDALE BC: Perhaps we could have some clarification from the County as to whether they regard them as a definitive list of criteria or whether they are simply guide to the kind of development that they are seeking. If they are just guidelines, then indeed they could go in the text, but if they are considered to be fairly definitive list of circumstances where development may be acceptable, then I think they should stay in the policy.

THE CHAIRMAN: Mr Hale?

FLD: If I can help you first by asking the question whether it is in line with RPG and PPS 7, I turn to PPS 7, which might help this discussion a little bit further. In paragraph 17 it talks about the reuse of buildings in the countryside. That is very specific.

THE CHAIRMAN: I think this really takes us on to the second question probably.

FLD: It is just about criteria. It is just a point raised by Mr Barden about criteria.

MR GIBBS: Mr Barden's point is are they criteria, not what the criteria should be if they are criteria. It is at an earlier stage than that.

FLD: I was under the impression he was saying there should not be criteria.

THE CHAIRMAN: We have not gone back to Mr Fairlamb yet to ask him whether they are or they aren't. Would you be better if we went to him first, and that might help?

AUTHORITIES: Just to pick up the issue of are the criteria or aren't they; the intention of the policy is to flag up and put down as markers the issues which should be accommodated with development. But they are certainly not a comprehensive list of criteria. Obviously all the policies in the structure plan would need to be satisfied before development could proceed. They are there to mark the attributes of a particular development, which would encourage the Planning Authority to consider it favourably.

THE CHAIRMAN: So would you have any objection to them being moved into the text as exemplifying what the policy is trying to do? Would that give you a problem? It is not a comprehensive list, as you said earlier.

AUTHORITIES: I think because of the nature of development in the rural areas, of which there are obviously issues in terms of scale and character of development, I think it is important to flag up these particular aspects which have been drawn from what the two authorities consider are the key issues which need to be considered in looking at proposals in rural areas. We would prefer them to be retained in the policy, to ensure they are considered as part of the development assessment.

MR GIBBS: I am going to go a little bit further on that. Is that to indicate that what you are primarily thinking about within the terms of this policy is conversion of existing rural buildings, buildings within the countryside?

AUTHORITIES: That's correct, yes. As a first consideration we would look to the potential for conversion or extension as opposed to development in the open countryside. So that is something which would need to be considered.

MR GIBBS: I deliberately didn't say "development within the open countryside", because as soon as one uses the term "open countryside" one is into different types of interpretation", in that a set of farm buildings in the open countryside can easily be regarded as in the open countryside, and most of us would. But you are not saying that such farm buildings would not be ones you are potentially looking at, as I understand it. You are looking at existing buildings in a rural context having potential?

AUTHORITIES: That's correct. Actually I refer to the last paragraph in the policy, which does clarify particular circumstance where we are talking about new buildings in the open countryside. The first part of the policy we cater for the use of buildings, the conversion of buildings in all parts of the countryside.

THE CHAIRMAN: So from your point of view, these are criteria, and the first one is a particular important one. The other ones, to some extent, are generic but the first one, you are drawing attention to the fact that you want this form of development to take place primarily in existing buildings. That is a key criteria.

AUTHORITIES: That's correct, yes.

THE CHAIRMAN: Which I think is -- if I come back do Mr Barden -- something that would give you some concern?

BARDEN PLANNING CONSULTANTS: Not only would it give me concern, sir, I think it would change the whole nature of this policy. It seems to me this policy is written to encourage new development in the countryside. It is not in the open countryside. It is talking about the smaller settlements; the local service centres, other villages and so on -- the countryside generally.

It is only the last paragraph which we have not yet got on to discussing that refers to the open countryside, and it seems to me that what has gone on around this table admirably demonstrates the problem that we have. We get a policy which is encouraging on the face of it, seems to do what regional guidance and PPS says we should do, and then immediately seems to take it away by a string of criteria. You have within that policy, on its bold statement at the beginning, something that says they would be permitted "where they are of a scale and type sympathetic to the character of the area, within which they are proposed".

It seems to me that is enough. That gives you the fundamental issue in terms of protection of interest in the countryside.

It then talks about the sort of thing that one might welcome forward. These sort of things will be encouraged. But when bracketed into the policy they are read as being that is what you have got to do rather than these sorts of things will encourage, but it does not preclude other things that do not fall within that. For instance, if we are not able to find new existing buildings or brownfield land in a rural settlement, and we

have some employment need there, where we have someone who just wants to set something up there, why should he not be able to, given the nature of the policy, if it is not damaging to landscape? I am convinced that if you read it in this way, we, on the development side, have tried to make things happen rather than those who try to stop things happening. We have difficulty arising from this. Given the general nature of government guidance about regenerating the rural economy, this is very unhelpful.

THE CHAIRMAN: So to try and exemplify this, say we have a local service centre, not a key service centre but a local service centre defined in a local plan, and there is a suitable brownfield site, in infill site etc, within that certain area, but no suitable existing buildings, under this policy that would be possibly ruled out. That is really the concern you are addressing. We are not talking about the open countryside here. We are talking about development in conjunction with rural settlements.

BARDEN PLANNING CONSULTANTS: Yes. It is possible it will be ruled out. I don't think actually on proper reading of the policy it could be ruled out, but I think people will attempt to rule it out. I think there is a difference between reading this carefully and saying what it actually says, because it just says "in particular".

I think if we were in a public enquiry now, dealing with a Section 78 appeal, I could argue the merits of this policy precisely on its wording. Unfortunately, most things are dealt with by planning applications in front of a planning committee, and you don't get that opportunity, and this kind of thing is very often misrepresented.

CUMBRIA RURAL ENTERPRISE AGENCY: Just to add to Brian's comments, there is a live and lively and active debate about the differences between rural and urban, and whether we need an easier transition, and a more comfortable transition, between urban and rural; whether there is an urban/rural schism. That is a little bit conceptual, but in practice it means that, certainly in this area, that we are fighting the last bastion. Brian is smiling. I think he would agree with me. We need to ease up a little bit.

In my capacity as a rural planning facilitator, with 17 planners working out there on pre application advice, there are imaginative, innovative ideas coming through which are being stifled. I hate to say it. I am a planner, and have been for 30 years, but they are being stifled. You would agree?

BARDEN PLANNING CONSULTANTS: Well, I don't know of the particular things you are talking about, but there is generally this. I think the big problem is everybody agrees in principle, everybody wants this, but then everybody wants to put a string of little checks and balances that very often negate the fundamental. I am just looking for clarity. If there are going to be criteria and they are in there, I know I have to work to them, if they are not going to be criteria, I want them in the text. It is as simple as that. We will work with them whichever way they are, but I think it should be clear the way they are.

CUMBRIA RURAL ENTERPRISE AGENCY: Indeed, and that is the point I wanted to make a few days ago, is the word "appropriate" needs to be wiped out from this text, and we need to be clear about who decides and what is appropriate. It needs to be loosened up.

MR GIBBS: I just want to come in to point out to people participating here, if you look at RU 2 and the first two bullet points, as well as the use of "appropriate" in each of the bullet points, which is perhaps not helpful, the first of the bullet points talks about "key settlements" and then "development or conversion of premises in villages", and then the second bullet point relates to the "conversion of farm and other rural buildings".

Now, I think what Brian Barden is talking about here is that this policy addresses both development in villages or local centres, whatever you like to call them, and conversion of farm and other rural buildings, but does not separate out that element that in villages would make allowance for development as well as conversion of premises. So in that sense RU 2 is more comprehensive and perhaps clearer, even though it uses the word "appropriate", than is this policy EM 14.

THE CHAIRMAN: Could I bring in Mr Evans. I want to check if any of the districts want to speak briefly to this point.

ALLERDALE BC: Brian has sowed some seeds of doubt in my mind. In particular I took the phrase "key service centre" to include local service centres. I took it to be a generic term to encompass all service centres, and so I was looking at this policy as a policy that controlled development outside in the open countryside outside all key centres, and if that is the case I perhaps would like to make a point in terms of PPS7, which talks about such development being well related to outside, and there may need to be a little adjustment there. But if it is just the bigger service centres and not the local service centres, then it is a different issue.

THE CHAIRMAN: Yes. I think that really follows on from the point that Simon was just making in relation to PPS7. Can you just clarify one point, are we talking here about local service centres outside of them as well, or just the key service centres defined in ST5?

AUTHORITIES: Yes. Just to clarify, obviously this is an issue and I think it is something that perhaps should be considered in terms of separating out the areas of concern in the issues, but coming back to a point that you raised, Chairman, at the beginning about reading policies together, actually policy ST6 of the structure plan sets out very clearly the relationship between urban and rural areas and certainly gives scope for economic development both in key service centres and local centres. This policy certainly doesn't remove that possibility. It is just referring to an encouragement in particular for developments outside key service centres which display the characteristics in the four criteria. The only qualification is relating to development in the open countryside which would be outside defined development limits of key service centres and local centres, and the strategy does explain that local centres and key service centres should have defined limits.

THE CHAIRMAN: So would it give you a problem if in the first line of EM14 you added 'key and local service centres', just to make it clear that this policy only applies outside of those?

AUTHORITIES: The policy actually does still apply to local service centres and we would still seek developments which utilised buildings within local service centres. It wouldn't obviously preclude new buildings in local service centres, but particular regard needs to be had for the potential for reusing buildings in local centres also.

MR GIBBS: Sorry, I am afraid you have lost me there, because I thought you said one thing and then you seem to say something that was different to my understanding of what you had just said. Are you saying that EM14 applies to local centres or does not apply to local centres, because first of all I heard you say one thing and then I heard you say something different?

AUTHORITIES: No. I did say that it applied to local centres.

MR GIBBS: Sorry, I need to put my question more precisely. In saying that it applies to local centres, are you meaning that the first phrase applies both to key and local service centres, or are you saying that the policy as a whole only applies...

THE CHAIRMAN: Actually I would put the other way round, because what the policy is saying...

MR GIBBS: I am totally lost, so I think everybody else is as well. Mr Barden has never seen a point quite so clearly amplified as he has sought to achieve.

THE CHAIRMAN: I think the policy is defining areas outside of something, right? So it is either outside the key service centres, which are listed in ST5, or it refers to the areas outside those plus local centres defined in local plans, not in this plan. Now, the question is which of the two excluded areas: is it just ST5 areas, or ST5 plus local service centres? That is what we want to know.

AUTHORITIES: Well, I can certainly qualify that for you in the way you have expressed it there, because the first sentence in the policy says, "This policy applies to the area outside key service centres", so therefore it would apply to local centres.

THE CHAIRMAN: As it stands at the moment, I think the question I was trying to put to you earlier was if it was defined as outside key service centres and local service centres identified in local plans, etc., would that policy still be satisfactory from your point of view?

AUTHORITIES: Well, it wouldn't, no, because we want those matters considered for development in local centres, so we prefer the wording to remain as it is.

THE CHAIRMAN: So, coming back to Mr Barden and other points, there may be circumstances if it was read in a certain way, perhaps a very strict way, which might preclude new build in local service centres; that is a possibility under the wording of this policy, with the criteria we have listed? I think that is what you were saying, Mr Barden?

BARDEN PLANNING CONSULTANTS: It is part of what I am saying. I am saying that none of them should be in there. I am quite clear that it relates to everywhere other than the key centres, if I can put it that way; everywhere other than key centres that policy applies, and because it applies everywhere other than key centres, which includes local centres and other villages and so on, it should clearly

accommodate new buildings in certain circumstances. But I simply believe that the list of things that have been encouraged, it should either be said 'These things will be encouraged', or it should really ideally be put in the text. I mean, I am clear what it applies to. I mean, Mr Evans raised the issue that he thought it was not applying to local service centres, and that was never in the text, which clearly it wouldn't apply to them, and ST6 sort of does encourage development within, and I have suggested that given the PPS guidance, that should be modified slightly to have 'and adjacent to'.

THE CHAIRMAN: I think Mr Fairlamb wants to clarify something.

AUTHORITIES: Just briefly to pick up on what Brian Barden has said. Certainly the use of the word 'encouraged' would be acceptable to the two authorities in preference to the use of 'in particular', if that was seen to be a preferable way forward.

THE CHAIRMAN: Sorry, could you say that again, please?

AUTHORITIES: Brian Barden suggested the use of the word 'development will be encouraged which', and then the list of matters. We would certainly accept the use of that word 'encourage' in preference to the use of 'in particular' if that was seen to be the problem.

THE CHAIRMAN: So that wouldn't rule out new build in local service centres, but it would particularly encourage these items?

AUTHORITIES: Well, we don't feel the policy does rule out new building in local centres, but it could help for clarification.

THE CHAIRMAN: Mr Bamber.

GONW: I think this is perhaps, to my mind, the best illustration we have seen so far of the value of these proceedings, in that Mr Barden and Mr Brockbank have introduced a reading of the policy which hadn't occurred to me, but which is clearly a reading of the policy which might (inaudible). The key question in terms of what this policy should be doing in terms of government policy, is it sufficiently permissive of developments in or next to settlements, Mr Brockbank raised the question of allocations. It doesn't to my mind rule out allocations. PPS7 implies that you could have allocations. That perhaps is more a matter for local development documents and you could have that debate there. But yes, there are clearly question marks in terms of clarity that have been exposed against this policy. It should obviously be read against ST6 as you pointed out, but in some ways it might be regarded as taking it away from ST6 if those bullet points, whatever you want to call them, were misread. Actually the first bullet point of course is a legitimate expression of a sequential approach, and Mr Fairlamb is correct of course, it says "...utilise well suited buildings or previously developed land", which implies new build, but it perhaps could be interpreted restrictively in terms of good new build in local service centres which fulfil the fourth point, assisting in the maintenance of traditional landscapes and buildings. Of course you could have good modern architecture in local service centres that would do that, and we would want to encourage it. So I would like to revise my previous position and suggest that while it doesn't go away from policy too much, it does need clarifying certainly.

THE CHAIRMAN: Mr Pealing.

RURAL REGENERATION CUMBRIA: I am glad we are having this debate because you will recall that I raised some issues about this last Wednesday, and of course it wasn't the appropriate time, so I am really pleased that this has come up because I was pretty confused last Wednesday when I was referring to this policy and talking about the reuse of farm buildings, etc., in the open countryside, and I alluded to the development by those regeneration companies based at Hackthorpe. It seems to me from the way that the debate has gone the policy really needs a substantial rewrite. We are talking about local centres outside key service centres, we are talking about open countryside, we are talking about new development, and we are talking about the conversion of existing buildings, and the way the policy is written at the moment is confusing all of those. The only thing that is actually clear is the second paragraph relating to the development of new buildings in the open countryside. There is a clear policy statement to that, but the others aren't very clear. And I referred last Wednesday to regional planning guidance policy RU2, which actually is quite clearly written. It is written very clearly, it talks about land provision, it talks about the conversion of farm buildings, because reading through this this morning I am still actually confused about whether the reuse of existing farm buildings for employment use which isn't related to the existing farm would or would not be allowed.

MR GIBBS: I think that's maybe the next question, and will come in probably under the next question particularly.

THE CHAIRMAN: But I think in principle, and Mr Fairlamb I am sure can confirm or deny, but I think in principle, and subject to other qualifications and other policies in the plan, the reuse of farm buildings can be looked at under this policy, but obviously subject to other considerations. I think we maybe have had enough discussion on this particular topic, and I think it has helped us to be able to go away and have another look at the detailed wording of this particular policy.

MR GIBBS: What I particularly heard the County Council to be suggesting for us to take away is that instead of it saying 'in particular where such developments', it would be 'and will encourage such developments where', and then 1, 2, 3 and 4, possibly not including the 1, 2, 3 and 4, but those subsequent points, and it will then come on to the in addition point in the rest of the policy. That is what I heard them put to us.

AUTHORITIES: Yes, that is right.

THE CHAIRMAN: Before I go on to the second detailed point, I still really want to go back; I think we sort of jumped into this detail quite quickly, away from some of the more general points that Mr Brockbank was making earlier on. To some extent we have covered this; how far is the policy facilitating, encouraging in line with RU2, but we have focused perhaps a little bit narrowly. Mr Brockbank raised the issue of needs and adequate information; had enough account been taken of the needs in rural areas. That is the point you were making, and I will put a marker down for Mr Fairlamb to come back on that one. But are there any other general points people want to raise as to whether this sufficiently facilitating not just the policy, but the text that goes with it as well?

MR GIBBS: In such a discussion it might be worth picking up on one of the words that Mr Brockbank used, and I think Mr Bamber picked up as well, which is that Mr Brockbank did use the word 'allocate', which of course has a particular meaning in the planning context. I would imagine that we are taking of a general policy which enables/facilitates rather than seeks to allocate, or to see local development frameworks allocate land, because we are not going to be able to anticipate all the needs and opportunities that come up; we are looking for a policy which is phrased suitably to be able to respond to situations such as the ones that Cumbria Rural Enterprise Agency might come forward with, rather than something which was rather more rigid as an allocation type response. That is my understanding of the County Council's position, but it may be helpful if they said.

AUTHORITIES: Yes, that's perfectly correct, but I would also draw attention to policy EM12 in the structure plan proposed changes which maps out and sets out the requirements for land throughout the structure plan period which is based on an assessment within each of the sub county areas and an assessment in terms of need and in terms of the local socio economic conditions in that area. But as you rightly said, sir, the actual detailed allocation of those sites would be a matter for local plans in the setting of local needs and issues in terms of determination as to where the particular site was allocated, that is correct.

THE CHAIRMAN: Are you saying then that the issue of need – it has been addressed, I think you are saying, in the preparation process of this plan, and it is expressed principally in EM12 which identifies the provision of employment land development opportunities across the county, and some of these obviously are in urban areas, the City of Carlisle and Barrow, etc., but probably the majority of them are going to be in smaller settlements throughout the county, is that correct?

AUTHORITIES: That is correct, and also where the local needs will be identified through a finer grain process at the local plan stage, and obviously sites can be identified to meet local needs as extension to the local centres or key service centres, and if you read the structure plan policy ST6 it allows for local plans to extend the boundaries of both key service centres and local centres to accommodate further employment land which subsequently can be developed for work space.

THE CHAIRMAN: So the issue that was raised earlier about on the edge of settlements can be addressed as well?

AUTHORITIES: That is right, yes.

THE CHAIRMAN: Before I bring you in, Mr Bagot, can I just go back to Mr Brockbank and ask does that deal with the question of need that you raised?

RURAL REGENERATION CUMBRIA: Well, it does outside the National Park, but I still believe that the structure plan hasn't identified any need within the National Park. I apologise if allocation and provision is the incorrect terminology, but you will excuse my non-professional planning background, but when you look at the M12 and you look at the provision of space within the National Park against no identified need because the work has not been incorporated into the document as it should have been, and the lack of provision, and bearing in mind that the National Park is some two-

thirds of the rural area of Cumbria and how little engagement there has actually been in assessing the need and then making the provision rather than the allocation.

THE CHAIRMAN: Thank you. Gill Longfellow, could I bring you in.

AUTHORITIES: We did have a discussion last week on the amounts of land allocated throughout the county and how that was actually achieved looking at the previous take up rates and so on, and I did make the point at the time that within the National Park a substantial amount of employment land development comes forward through the conversion of buildings, and that has also been taken into account in setting the amount of land to be allocated within the Lake District National Park. Certainly as we go into the local development framework process, we will be looking in more detail at the local need within the National Park and take it forward from there.

THE CHAIRMAN: Mr Bagot.

NORTHERN REACHES RESTORATION GROUP: We, just from the point of view of the Northern Reaches Restoration Group, would like to emphasise within this policy, we would like to strengthen the condition of the economy; as we have said, the canal line could and should have provision along its length for such developments as for instance marinas. Now, that covers land; it does not cover buildings. Buildings have been mentioned considerably. We should I think bring in the land itself as well where it is needed. We also wonder whether the policy should reflect more the need now required because of foot and mouth and all that that has thankfully now passed, that the agricultural community is still on its knees, and that I think needs addressing more and could be addressed more on the length of the line we have in mind.

THE CHAIRMAN: I will ask Mr Fairlamb in a moment just to come back on the needs of the agricultural community, which again is picked up quite clearly I think in RU2. You have brought me on to my last item under this first question, again a question back to the two authorities which you have raised as well, as to whether there should be some mention in the text of the plan to the canal restoration project as a significant project which could assist rural regeneration. That was my question, and you have actually raised the same question. So could I put those two back to the two authorities; firstly, is there more to be said about assisting the agricultural sector and then the canal itself?

AUTHORITIES: On the first issue of agricultural needs and diversification, the two authorities would maintain that they are adequately addressed. In fact, there is obviously a full section in the plan dealing with employment development in rural areas. The provisions for agricultural use are catered for in terms of the diversification of farm business, and we feel that policy EM14 certainly gives adequate scope for that in allowing for a scale of development which is appropriate to accessing, gives potential for the reuse of existing buildings, and even adds an exception at the end for new building, which is actually questionable under PPS7 which says that we should strictly control development in the open countryside, we actually give an exception for new build in the open countryside where it is an expansion of an existing business. We will be coming on to that point later in the debate. But that really demonstrates the fact that we are catering for the needs of

existing agricultural businesses in the county, and we are allowing for them to expand and diversify where there are needs.

In terms of the Lancaster Canal, this obviously raises different issues, but again it does not suggest that the structure plan is preventing that development. In fact, the scheme itself is a transport scheme and is listed in schedule 2 of the structure plan, but also there is scope within the strategy of the plan which identifies key service centres and local centres for those to develop on the back of the potential of the Lancaster Canal, and certainly we would maintain our principles that most developments should be centres in those areas. Of course EM14 actually does also allow for the conversions of buildings potentially which are along the route of the Lancaster Canal for employment uses, or tourism uses associated, so again there is potential there to be accommodated within the policies. I think in terms of a specific scheme, such as the Lancaster Canal, we would suggest that that is more appropriately dealt with through the South Lakeland local plan which it would be within, and there is scope there for testing the merits of the overall scheme, and actually in the new planning legislation there is scope for the identification of an action plan which could consider all of the development implications of that development within it. So certainly we feel that there is scope for development associated with the Lancaster Canal, but we would like to see the key principles and policies contained in the structure plan recognised when considering that proposal.

THE CHAIRMAN: Maybe, Mr Bagot, that helps you a certain extent in that there are policy pigeon holes in the structure plan which facilitate what you are seeking to do. I shall bring back the issue of the canal later when we are dealing with tourism as well, so we will come back to it then if that is okay. Do you want to add anything to that, Mr Bagot?

NORTHERN REACHES RESTORATION GROUP: No. I obviously would have liked to have seen the canal have more coverage than just purely – it's very nice to see it in schedule 2, but it would have been nicer to have had a bit more, but maybe we will be happy with what we've got.

THE CHAIRMAN: I will bring the issue up again in relation to tourism, because obviously it is relevant in that context as well. Mr Barden

BARDEN PLANNING CONSULTANTS: It is just a point of clarification really. Mr Brockbank referred there specifically to National Park. In my initial representations I raised the question is policy EM14 as it now is, 12 as originally, intended to relate to National Park as well as the county at large; you have put all your points to Mr Fairlamb rather than to the National Park. I just want to be clear that as far as I read it it does, can we have clarification that there is no intention to exclude the National Park from that?

MR GIBBS: From our end we put things to the joint authorities; the fact that Mr Iain Fairlamb was responding was not in our view meaning that he was responding only for the county, but the Lake District National Park Authority can perhaps confirm that.

AUTHORITIES: Yes, I can confirm that this policy does cover the National Park as well as outside.

THE CHAIRMAN: And also that Mr Fairlamb is speaking for the two authorities. Carol Crawshaw.

CUMBRIA RURAL ENTERPRISE AGENCY: I would like to make the point again which I made last week, which was just raised by Mr Bagot, that in terms of planning policy it's a matter of interpretation but there are numerous supplementary planning guidance notes coming out not just within Cumbria but throughout the region where we work about farm diversification, and the policy suggests that in order to qualify to be acceptable in claiming terms that the proposal has to be smaller scale and smaller in terms of income generation than the actual farm holding. And our argument is that there are proposals which are larger in scale and larger in terms of income generation with low environmental impact, but keep the farm holding in place and keep the families in the community. So clearly it is not just simply about the economic initiatives, it's also about keeping sustainable communities, and I think that has to be written in to planning policy documents. So farm diversification is much more than simply added value in a small way.

THE CHAIRMAN: Unless there are any other comments on this question (a), I want to move now on to (b), which we have already touched upon, which focuses on the final paragraph of EM14. Just to be clear about this, firstly, this applies not to local centres or key service centres, it applies to the rest of the county, areas outside of centres basically, open countryside, and it does apply to the whole of the county including the National Park. Under this paragraph two situations oppose: one is that if you have an existing business, an existing firm, company, operating in buildings in the open countryside, then if all other things being equal and all the requirements being satisfied, then new build can be considered for that particular enterprise, but what it does not allow is for a new enterprise to set up and have a new build situation in the open countryside. I think that is essentially what you are saying. Perhaps I can go to Mr Fairlamb on this occasion just to be absolutely sure that that is the way the policy should be read.

AUTHORITIES: Yes sir, that is correct, the reason being that we are following through guidance in PPS7 and RPG, which clearly states that their development in the open countryside should be strictly controlled and that the focus of development should be on existing centres which should take the majority of new development. This is consistent with sustainable communities, sustainable patterns of development, which is reflected in our structure plan strategy, and it was felt that this was an appropriate way to take that forward. It is allowing for the exception for in situ business to allow a business which wants to utilise its existing assets to expand and grow. What it is saying also is that new business, footloose business that is mobile should really be directed to key and local centres to help sustain the vitality of those and prevent a scattered nature of development in the open countryside which could affect its quality and character.

THE CHAIRMAN: Could I just put back to you consistency with PPS7, paragraph 19. That refers to replacement of buildings in the countryside, I think it has been mentioned already by one of the participants, and that does allow for replacement of existing rural buildings with I think the implication is better designed, more appropriate, modern buildings, and that doesn't link that possibility to whether it is an existing building or a business or a new business coming in. so do you feel your policy is consistent with that aspect. Do you feel your policy is consistent with that

aspect, that particular paragraph of PPS19 because my reading is that there is a bit of conflict there?

AUTHORITIES: This is a new aspect in PPS7 which was finalised following the preparation of the policies in the Structure Plan. It does qualify in PPS7 that replacement buildings should be treated in the same way as the reuse or extension of buildings and certainly that is something which we would maintain should be followed through in this policy. You are correct to say we don't refer to replacement buildings in the policy and that might be something that should be added for clarification.

THE CHAIRMAN: I think Mr Evans had an example in his submissions of small new businesses that might set up and require new buildings. Is that correct?

ALLERDALE BC: What are you looking at, sir?

THE CHAIRMAN: I am looking at my brief crib notes of which I have summarised people's points made in their further statements. Don't worry. Give me your comments.

ALLERDALE BC: I was wanting to make the point that we support the joint authorities in this case in the thrust of their policy in the open countryside. We would wish to resist new build scattered in the open countryside which otherwise could be easily located within key service centres. We would fully support the intention regarding existing businesses, farm diversification and replacement. In our own local plan the policy does allow for replacement as well as extension. Looking at PPS7 which being a new document I haven't looked at all the nuances of it, having looked at paragraph 4, to which Mr Bamber has already referred, there is a potential tension here in terms of the wording in allowing for limited development outside settlements which are not designated as local centres. I would appreciate the joint authorities' thoughts on that whether there may need to be a slight adjustment to the policy to clarify that issue. It may be that the policy thrust won't change but to clarify that tension that there might be between that policy and that paragraph.

THE CHAIRMAN: I want to bring in South Lakeland, because this is something you were uncomfortable about.

SOUTH LAKELAND DC: As economic development officer at South Lakeland this is a situation that we come across very frequently in our area. Our council believes that EM14 is unduly restrictive. The reason being as it is currently drafted this policy does not cater for new entrepreneurial activity, new business start ups and diversification away from agriculture. Nor is it sensitive enough to the differences between rural areas and the local economies. Particularly the problem that we have with it is that it is all about a question of balance and what we feel is needed is a balance between environmental and social economic issues. A cross benefit analysis or a criteria based approach to new buildings for employment use rather than what is coming across as a blanket restriction which in effect would preclude all development except where proposal forms and expansion of an existing business would, I feel, achieve that balance and if this policy is rigorously applied, and it is coming back to Mr Barden's point earlier, a lot of this is in the interpretation, the rural economy will

continue to rely on agriculture and tourism. New businesses will be precluded and rural areas will not gain from the revitalisation of efforts of the UK and EU policy funding bodies. All of the guidance that is coming out of DEFRA's rural strategy, the EU's support for rural development and the new rural development agricultural fund for 2007/2013 are stressing that we need to move away from just agriculture and at the moment this seems to be that the only thing that is going to be permitted in the open countryside has to be associated with agriculture and my argument is that there is strength and diversity in what we are trying to do as a local economy and to increase the diversity of local businesses so we feel this is too restrictive.

THE CHAIRMAN: The point that is made in the plan is that most economic development in the countryside should be directed to the key service centres that are listed and also the local centres which will be listed in your local plan. His point is that there will be new build for economic development purposes in the countryside adjacent to local centres. To what extent does that meet your concern? We are talking about open countryside, away from villages, et cetera, isolated development. I hear what you are saying about the importance of new build and diversification but to what extent will your concerns be met within the framework of the strategy as we have it now?

SOUTH LAKELAND DC: It is still too restrictive in that it is still directing those new enterprises into key service centres. Our argument is that because self employment is so important to this area and rural areas, for example, in the Lake District we have 19% self employed as a proportion of the total employment from the 2001 census. Not all self employed people can or would wish to work from home and even those who do begin in this way, often businesses are started round the kitchen table or in the back bedroom, they often find themselves having to expand and they need additional premises. If this policy is rigorously applied, such businesses are going to be forced to relocate to more urban areas or a key service centre and my argument would be why should they be forced to do so when all we are talking about is trying to maintain the sustainability of local communities and this could force them to move out of their local community for employment purposes?

THE CHAIRMAN: The main focus of your concern is very small micro businesses, one or two people. You are talking about relatively small buildings were it to be new build?

SOUTH LAKELAND DC: Absolutely.

THE CHAIRMAN: Mr Barden?

BARDEN PLANNING CONSULTANTS: This is another example of when you try to write something in as an exception because it is not then comprehensive so you flag up the difficulties of someone who discovered a source of spring water and couldn't bottle it at home and it needed a new building. It was my example that you were thinking about.

THE CHAIRMAN: Yes, sorry.

BARDEN PLANNING CONSULTANTS: South Lakeland, although they have not mentioned it, do have a policy in their local plan and have had for several years, which does permit small buildings in the rural area outside settlements for employment purposes. I have used it on a number of occasions to have a small building approved. It has not created any problems. The only real concern has been about driving a coach and horses through rural planning policy. One neat suggestion to get round this would be to simply delete that part of the policy. So if you leave it as it stands, it is another example of trying to be more particular about it. You create one possibility of exceptions and then immediately you think about the other possibilities that are not being catered for. If you left off the 'in addition' you have already got the facility in the policy of a scale and type sympathetic to the character of the area where you would permit them. It may be that is an easier way than trying to make a list of exceptions comprehensive. It seems to me odd that if you are able to establish yourself in an old agricultural building and then you are expanding you can have a new building in a countryside but if you are the farmer's daughter and you are not diversifying that farm but setting up your own business and living there and you could put a small building there and run a small business, you wouldn't be allowed to do it. If you started it off in the house or in a barn you can then do it, but if you don't start it off in the barn and immediately say, "I want to run a business from home, I want to erect a small building to do it," you can't do it. Both may be wrong but it seems to me that if you are having that policy of facilitating small buildings in the countryside - and it may be that small is the issue though there might be the odd exception to that if you did have the bottling plant - it does seem to me that once you go down the exception and say you can only diversify a farm business when the policy is about diversifying the rural economy and if the man is not going to continue farming and or even if they sold the farm land off and there are still the buildings and the land and they are diversifying the rural economy where they have always worked for generations, is there a good reason why more buildings that of the right scale shouldn't be permitted?

THE CHAIRMAN: I will put that back to Mr Fairlamb after Mr Brockbank. What you are asking for is to remove that final paragraph and control the development we are talking about in the remainder of the policy?

BARDEN PLANNING CONSULTANTS: It seems to be relatively easy that way.

THE CHAIRMAN: I will put it to Mr Fairlamb. Mr Brockbank?

RURAL REGENERATION CUMBRIA: I do think there are large applications that should be considered in the countryside and there are some in the process at the Gateway project, the abattoir projects that are in open countryside and we should be considering those. If you don't consider them we are setting ourselves up to fail in diversifying, encouraging and expanding the rural economy in Cumbria. Policy EM12 lists the provision of land for employment purposes. I have seen no research that backs up the joint Structure Plan in front of us which shows in South Lakeland where this provision of land is either within key service centres or local service areas. We are totally setting ourselves up to fail and I feel the provision in EM12 is insufficient when you compare it to Next Steps and what all the authorities agree ought to be provided to bring the Cumbrian economy back to the national average. Not only is EM12 inadequate in its provision but also it is not backed up by any

empirical research as to where this provision can be found within the existing key service centres or local service areas and that is why we have to consider the development of potentially large-scale developments in the countryside that are not related to existing businesses which is a huge moot point. If we had not learned anything in this county it is the fact that we are so dependent on foot and mouth to tourism and agriculture. We need new industries and they need to be in good competitive efficient premises and they need to be in open countryside if we are going to get the economy in this county on a national level. On all those three points, this policy is completely devoid of purpose and sets us all up to fail.

THE CHAIRMAN: Mr Hale?

FLD: At the South Lakeland local plan inquiry in 2002 we were invited to get the old PPG7 criteria relating to preferential use given to employment rather than residential use and the argument that the head of economic development came back with was it was their experience that demand for employment use in rural buildings was very low. There was no evidence that there was a requirement for employment uses in rural buildings. That was their argument against having that criteria in the local plan. The second reason was because of the cost of conversion. It was prohibitive as against residential conversion and for that reason they found that the old criteria was too restrictive in PPG7.

THE CHAIRMAN: Mr Bamber?

GONW: Just a few points relating to Government policy. I have already referred to paragraph 3 which say where most development should be in rural areas. We should also note the type of development which PPS7 is implying should be considered in the countryside, paragraph 15, sustainable development that supports traditional land based activities and it also says planning authorities should continue to ensure that the quality and character of the wider countryside is protected and where possible enhanced. Then paragraph 16 refers to the kind of things that local planning authorities should do such as supporting development that delivers diverse and sustainable farming enterprises and supporting other countryside based enterprises and activities which contribute to the rural economies.

Looking at this policy, Mr Brockbank thinks the policy doesn't have a purpose. The purpose was to cut down on sporadic development in open countryside which is generally not a good idea because it damages that which we tend to value about the countryside, its rurality. I wouldn't have thought we would be persuaded that it is a terrible hardship to say, "Don't put this business here, put it in a local service centre which isn't going to be more than three or four miles away." I don't know about you but I have never lived less than five miles from my work place and I have never considered it a terrible hardship.

On the other hand, some valid points have been made relating to businesses which have to be in a particular location like Mr Barden's spring water bottling plant or perhaps businesses which are relating to living on the farm and maintaining that family occupancy of the farm, which is the kind of thing Mrs Crawshaw has referred to. We then go back to the strategic policies such as ST6 which refers to it being the exception for new development and perhaps there is a certain amount of contradiction

in that this one is more absolute than that. Maybe meeting Mr Brockbank's other point, we already have ST4 which sets out how you deal with major developments and again that kind of linkage has to be recognised.

THE CHAIRMAN: I want to ask Mr Fairlamb when he replies about removing this paragraph, a further point would be if it were removed could the objective of cutting down the sporadic development be met by other policies in the plan which deal with sustainable development? Is it necessary to have a belt and braces approach? Can you control sporadic development by other means if this particular paragraph were to be removed? Mr Evans?

ALLERDALE BC: Chris Bamber has clarified a couple of thoughts for me on the scale and character and the types of businesses we are talking about. There was a tension in an issue with South Lakes and with Carol Crawshaw in terms of farm diversification and the type of business that is encompassed in the policy, how far you go in terms of relating the business back to the existing farm and what in PPS7 terms is supporting a traditional farming activity. How far do you go in terms of allowing diversification? In a way, there is a bit of tension between those two words, support and diversification. Is it simply supporting financially? Or is it supporting in terms of the character as well, of the use and the traditional activity on the farm? Chris Bamber's reference to Government guidance was helpful in that it did seem to suggest there was a point beyond which you would resist a certain type of activity even in farm diversification. I don't know what that might be but there is a problem with retail, for instance. I think there should be a point beyond where character comes in to the debate where if the intention is to support the farming activity and to support the retention of that farming activity, if that is your prime purpose, then there is a point beyond which you would not wish to go in terms of diversification. One other point in terms of the existing new build issue, it is possible in terms of this policy where you have an existing business where, as long as you take the sequential approach - and this is why I think those points should remain in the policy - whether it is an existing build or a new build --- I don't think I would wish to rule out new build but that would have to be subsequent to a sequential approach.

MR GIBBS: The second sentence in paragraph 3.19 talking about development in disbursed areas, "Proposed uses will therefore need to be consistent with a rural location." That may pick up Carol Crawshaw's point about appropriate because I would like to know what the county's understanding of that is and how they would see it being applied. Is it a condition attached to a B1 permission? If it is a B1 use, is it consistent with the rural location? I'm not sure how that works with planning inspectors if they want to work from home.

Secondly, one of the contributions made to this Structure Plan debate has been a striking visual one in that when I was in Kirkby Lonsdale looking at the Ruskin view, there is a farmer who has painted red and blue on his building and possibly white as well. Would it be helpful if those of you who have been directly involved in that or have read more about it than I have can explain whether that is the sort of activity that has an implication for the policy that we are looking at here.

THE CHAIRMAN: Obviously this policy is wider than farm diversification. It is part of it but it can be people who work at home and want to employ a few more

people and branch out. It is approaching coffee beak and then we are switching to tourism. I want Mr Fairlamb to round off. Are there any other points? Mr Hale?

FLD: In the Lake District National Park plan where it deals with farm diversification the text that supports their policy it says the NPA supports those diversification measures which helps sustain the long term viability of farming whilst respecting the character of the landscape. However, all farm diversification schemes will be expected to be ancillary in scale to the primary agricultural use. That was referred to in an appeal case relating to a bottling plant which was subsequently approved on appeal.

THE CHAIRMAN: That is helpful background. Mr Bagot?

NORTHERN REACHES RESTORATION GROUP: I am interested to hear what the answer is going to be when you questioned whether the last paragraph be removed, as I hope it will be. If that is not the course that is to be pursued we would like to see removed the reference to the proposal of forms and expansion of an existing business.

THE CHAIRMAN: Do you feel that particular paragraph will disadvantage the canal project?

NORTHERN REACHES RESTORATION GROUP: Yes. WE don't think it adds anything to what has been said earlier on.

THE CHAIRMAN: In the sense that you are a new business and you want to put up some new buildings in open countryside?

NORTHERN REACHES RESTORATION GROUP: Yes, and the land would need to change its use as well. For instance, a marina would take up land not buildings. It would take up buildings as well.

THE CHAIRMAN: But you are unlikely to be converting buildings. You want some new buildings?

NORTHERN REACHES RESTORATION GROUP: It is unlikely that we would be converting buildings, in my view, for a marina. We would be more likely to need new buildings.

THE CHAIRMAN: Mr Fairlamb?

AUTHORITIES: Just to round up on a number of points that have been raised and to come back on those points. In relation to the consistency of the policy with ST6 and EM14 I would draw attention to paragraph 2.23 which explains the circumstances under which development in the open countryside could be considered. It is specifically mentioned that it may be permitted in the open countryside where it has an essential requirement for rural location. For example, if we took engineering works associated with the Lancaster canal that could potentially be accommodated there. It also goes on to make an exception for development consistent with EM14 to sustain existing businesses. The intention of the final paragraph of EM14 was to give

a more positive spin and intention for businesses as opposed to other forms of development. We are allowing for an extension in the open countryside. As GONW have highlighted the intentions of PPS7 there is a clear statement in terms of the key principles that development in the open countryside should be strictly controlled and I come back to this point that this is where the Structure Plan is going. It is trying to bring forward into policy the intentions of PPS7, control development in the open countryside allowing for appropriate extensions.

Points were made earlier with regard to new businesses and again we feel that options are there for new businesses to be created. Obviously businesses could be set up and accommodated in key service centres or local service centres. There is nothing in the policy to prevent that but EM14 does still allow the conversions and extensions of existing buildings so if we had a scenario of a farm business wishing to utilise an existing building or any business located in the rural area because we don't wish to restrict it to agricultural businesses. A point was raised by South Lakeland that it was just for agricultural diversification. The wording of the policy would allow any existing business the potential for a new build where it was already in situ.

Yes, to further clarify the intention of the paragraph is to amplify the positive scope that we are giving for the expansion of existing businesses. If you were to remove that paragraph then that positive expression would be removed. Also you would lose potentially the scope to control the development, allow development consistent with PPS7 which again enforces the Government's intention to have sustainable patterns of development focusing on and expanding on existing settlements. That rounds up the position of the two authorities on that issue.

THE CHAIRMAN: Going back to 2.23 this is a further exception because it allows new development to take place where it has to be in a particular place like the canal. The canal is where it is, therefore any new building required by the canal has to be by the canal. It can't go to a key service centre. Or the bottling plant which has to be where the water is, that kind of example. That is an exception where it would be possible to bring forward a proposal for a new build or a new business could bring forward a proposal for new build where it is very geographically tied. That is almost a further exception to the EM14 policy. Is that correct?

AUTHORITIES: Yes, that would be correct. ST6 does give the potential for a business development which required that rural location so if it was required to tap into a natural source of spring water then paragraph 2.23 would cater for that consideration subject to satisfying policies across the board.

THE CHAIRMAN: I have no further questions. What about Ruskin's view?

MR GIBBS: They can let me know over coffee.

THE CHAIRMAN: We will start again at half past eleven.

(Short break 11.10 - 11.30 am)

ISSUE 3.3 - TOURISM DEVELOPMENT

THE CHAIRMAN: We are now turning to tourism. We have two questions to focus on. Before we do that, I would ask if Richard Greenwood from the Cumbria Tourist Board would just give us a five minute introduction on this subject, from his point of view. We have done this before in other sessions, and it is often helpful to focus on the broader picture before we go in to the finer detail of policy that we have been doing earlier on this morning. So, Mr. Greenwood, just five minutes.

CUMBRIA TOURIST BOARD: I am Richard Greenwood. I am director of development of Cumbria Tourist Board. I have a BA Honours in Town and Country Planning and I am a Member of the Royal Town Planning Institute, and I do welcome this opportunity to introduce the session.

Cumbria Tourist Board is a designated destination management organisation. It is a new breed of organisations. It is destination management organisation for Cumbria. As such it is responsible to the northwest development teams for developing and promoting the interests of tourism in the county.

Tourism is one of Cumbria's largest and most successful industries. During 2003, 15.5 million tourist trips were made in the county, a growth of 8.4 percent between 2000 and 2003. This generated spending in excess of 1 billion pounds, in real terms a growth of almost 13 percent over the previous three years. The Lake District National Park area captures more than half of Cumbria's tourism revenue each year.

Tourism activity in Cumbria directly supports over 25,000 jobs. Again that is a growth of 8.3 percent over the previous three years. Total number of jobs supported by tourism activity in Cumbria, however, is in excess of 43,000. One of the wider impacts of tourism spending to take into account. That is its impact on shops, garages and all sorts of other facilities. Tourism is increasingly a year round activity, with a remarkably broad seasonal spread. Percentage of total tourist numbers by quarter in 2003 was 17 percent in the January to March period; 28 percent between April and June; 33 percent between July and September; 22 percent between October and December. So it genuinely is an all year round industry.

The vision and strategy for tourism developed in Cumbria over the coming years is largely dictated by the Northwest Development Agency's Strategy for Tourism in England's Northwest; a 2003 document. Also it is influenced by founding of development plans, management plans, and, I think it is fair to say, the emerging community strategies for Cumbria and the other four sub areas of Cumbria. It is also informed by an extensive programme of research which provides the Board of up-to-date information about business trends, customer preferences and market changes.

The two most influential studies which guide the Board's activities were undertaken quite recently. Cumbria Tourism Survey 2002 and Cumbria Tourism Market Forecasting in 2003. The findings from those pieces of research are of real significance. The core tourism product in Cumbria is not in quite such the rude health that we thought it was. Fundamental changes are taking place in the market.

Traditional long stay holidays are in decline. The average stay is nearer to two days rather than the 5, 6 or 7 we have seen in the past. Fortnightly holidays have been supplanted by short breaks. There is a general flatness about performance in the core Lake District holiday market. There is some very mixed performance amongst tourism businesses and there is a high turnover of businesses in the tourism sector. Occupancy rates in serviced accommodation and in self catering accommodation, typically in the mid 50, mid 55 percents. There is a really growing concern about the appearance and condition of built up parts of the Lake District. It has been described as tired and run down.

There is, nevertheless, a recognition the Lake District National Park remains the centrepiece and crucial part to Cumbria's tourism future. It is the quality of the landscape, the quality of the National Park and its reputation, both nationally and internationally, that brings the majority of visitors to Cumbria. Nevertheless, there are other parts of the market which the Board and others are seeking to grow. Markets such as the Hadrian's Wall and Carlisle one in Furness.

The challenge is now to lift the quality of tourism and give the Lake District a contemporary appeal. The health of the central lakes is vital to the tourism market across Cumbria as a whole. There is a constant need to adapt and keep ahead of the game in what is a very competitive and fast changing industry.

So the Board's vision is to upgrade the Lake District tourism product throughout a programme of initiatives called Lake District Renaissance. That seeks to focus on improving the built environment and the public realm; to upgrade accommodation across all sectors, so we have high quality design and facilities; to introduce quality branding schemes so that people's experiences are universally good, right from arriving at a station to being able to book activities and accommodation easily.

We are also looking at brand development in other parts of Cumbria, again focusing on significant attractions such as Hadrian's Wall; to attract more cruise ships; to develop themes such as the active outdoors, cycle tourism, food and drink; to improve the skills of people working in the industry, and to ensure that the industry is a sustainable one well into the future.

All of these underpin CCTV's aims to increase tourism spend from 1 billion pounds, or in excess of 1 billion pounds at the moment, to 2 billion over the next ten years. Its focus is on value and quality, not volume, and on the long-term sustainability of the industry. It is widely recognised that tourism is one of the few sectors that offers a real prospect of growth in jobs in Cumbria over the course of the next decade.

So the crucial issue of this next session for the Board, if I might conclude, in the context of this examination in public is, will the policy framework in the structure plan, as currently written, allow the industry to compete and meet the vision and challenges it faces over the next ten years. Our conclusion so far is that there have been some significant improvements to the policy framework between the original deposit plan and the changes document, but we still believe there are further strides to take and further changes to make.

THE CHAIRMAN: That is very helpful. I have obviously read submissions and Cumbria Tourist Board submissions. I have also read and am going to refer to later probably the locum destination consulting report, Cumbria Tourist Market Forecasts, February 2003, which I think picks up some of the same themes you have just outlined.

One thing, before we open this up, I would like to put back to you is whether the Lake District's renaissance project is the big idea. Is that currently what you are running with as the big project? Would you describe it in terms of the big project for the Lake District, from your point of view? Is it that kind of thing or is it a bit more diffuse?

CUMBRIA TOURIST BOARD: I would say the most significant programme of the Board is seeking to pursue, over the next few years, and it is in the process of building up a commitment and partnership to that programme from the Local Authorities, the National Park Authority and other vital agencies, and also to try and ensure that there is sufficient funding from Northwest Development Agency and other agencies to actually make things happen. So it is in its infancy, but it is the big project.

THE CHAIRMAN: It is the big project, and obviously it goes much wider than the planning, and the list of items in the locum report does the same, but it does include quite a number of items which are relevant to planning, such as the built environment in the public realm, active recreation, supporting different forms of leisure etc. Would you expect to see this key idea reflected into the structure plan in some way? Before we get into the details of the specific policies, is there an idea which needs to be flagged up in the plan in some way?

CUMBRIA TOURIST BOARD: I think that would help, but I think more importantly the policies need to assume enough flexibility to actually accommodate the changes that we believe are necessary through the Lake District renaissance programme.

THE CHAIRMAN: I think there are two things really. There is the enabling policies, the regulatory policies in the plan. There is an issue of how well it is facilitated. We will come on to that. We have a number of detailed things we need to look at. But you are saying in addition to that, if this view -- and I think it is a widespread view, it is not just the tourist board's view -- of where the product is at the moment and where it needs to get to. If that view is widely held, I think you are saying that it would be helpful if it were expressed in the plan in some form or other as an overview, is that correct?

CUMBRIA TOURIST BOARD: Yes, it would do, and also in the community strategies which I suppose provide the broader context for the land use planning framework.

THE CHAIRMAN: I would like to open this up for general discussion and people to come back on Mr. Greenwood's analysis of where tourism has got to and where it needs to go to and this new renaissance initiative. I would like to get a feel round the table first. Mr. Pealing.

RURAL REGENERATION CUMBRIA: I'll kick off then. Rural Regeneration Cumbria is very supportive of the Lake District renaissance programme. We feel that the concerns picked up by the locum report are valid, and that there is a need to address those as a matter of urgency. Clearly there are issues surrounding the level of employment generated by tourism against other sectors of the economy. I am mindful about that.

I should just make it clear, I am not sure if Richard did, although the project is called Lake District Renaissance, it is a wider area than just the National Park. It embraces some of the outlying areas that have their own branding proposals. But clearly the way Cumbria is marketed in tourism turns focuses on the brand in the Lake District. So we very much support the idea put forward and are working alongside Cumbria Tourist Board and Northwest Development Agency, to try and put some funding in place to start some of the improvements moving.

Another interesting fact is clearly it is a very high aspirational target, doubling the level of tourism spend in Cumbria over a ten year period. I suppose Chief Executive, Chris Colley, made the point at the Northern Way Growth Strategy meeting that actually if the Northern Way is trying to achieve a 35 billion pound increase in the economy of the north, then Cumbria, just through tourism alone, if this project is successful, could provide 1 billion of that additional GVA.

THE CHAIRMAN: We are essentially addressing the first question in a general way. Does the plan sufficiently reflect the approach of tourism taken in RPG 13 in the context of Mr. Greenwood's presentation?

FLD: Can I welcome Richard's introductory comments, recognised by all of us and form a very good basis for the discussion. Obviously we are not fully aware of all the details that renaissance will bring forward at this stage. So, if we are to include renaissance in the plan, we do need to think very carefully about the shape and form it might take. We have a special area, the National Park; we have special areas outside the National Park, even in the Furness and West Cumberland coastal areas. There are some superb seaside towns. I think the worries some of us have is that we retain what is special about those areas. We don't want -- to use an awful expression -- to MacDonaldisise the area, and I am sure the tourist board share that with us. If we do develop a policy on renaissance, it does pick out to reinforce those particular qualities that make Whitehaven, Maryport, the Lake District, distinct from other areas of England. So that we can attract people to the area for our intrinsic qualities and not for something that they can find in America or in Southport or Blackpool, or whatever it might be. I think that is the important point to recognise.

Also in the aspirations of the tourist industry to expand the market and increase quality, I think again everybody signs up to the increase in quality, is to be aware of the debates I believe you have had already this week, about the relationship between availability of labour, availability of housing and the aspirations of the tourist industry, because in some areas where housing pressures are very high and local housing prices are relatively high and the relative way it relates to parts of the tourist industry, we are in danger of disjointed thinking unless we think about all these things together across the structure plan.

THE CHAIRMAN: It would be interesting to have a view from Mr. Wilkinson, Windermere Lakes Cruises, as a person who I guess is working in the tourism business. I would also like to give a bit of notice to Mr. Bamber, to ask him if, just again in very general terms before we get down to the specifics, whether the thrust of the plan is in line with RPG13, Policy EC9. It is a similar point to the one we had in the last session. Is it sufficiently facilitating, does it fall in line, with what you are trying to achieve in the region in the context of Mr. Greenwood's presentation? So if you could be thinking about that, Mr. Wilkinson, would you like to give a viewpoint from a business operation point of view in the Lake District.

WINDERMERE LAKES CRUISES: I am the managing director of Windermere Lake Cruises. We are one of the UK's top ten visitor attractions and carry in excess of 1.4 million passenger journeys on Lake Windermere. I would totally endorse the theme that is running through both Mr. Greenwood's comments and also Mr. Brodie's comments regarding the need to improve and maintain the quality. But I would point out the practical aspects of that, which might include capital investment etc., to improve the quality of the visitor attraction. That with current legislation on health and safety, environmental protection, etc. which we all support, does necessitate a change of working from the way things have been done in the past. That might include provisions for staff facilities, for buildings to maintain, in our particular business, vessels that are practical and specific to the new cause. So in terms of the theme of improving quality, the practical issues need to be taken into account and a balanced view formed.

In terms of the comment Mr. Brodie mentioned about the balance between affordable accommodation and wage rates in the area. That again is something that we would endorse. As an employer in South Lakeland but strategically relatively close to the A 590, we find many of our new employees are coming from the Barrow and the Ulverston area. What we are hopeful that we can do is encourage sustainable development, where we can address the need to recruit employees without adding to the problems that additional commuting may cause. That is something as a company we are conscious about and looking at.

THE CHAIRMAN: So investment is a key so far as the future of tourism is concerned?

WINDERMERE LAKES CRUISES: Yes, indeed, very much so, because looking at the tourism offering and the competition -- we will all have seen recent announcements of Manchester airport expanding, low cost flights abroad -- there has got to be a quality offering if we are even to maintain the current level of visitors we have. We feel the quality of the whole experience, and that includes the public realm and all the supporting factors, all has to be looked at in the overall.

THE CHAIRMAN: I turn to Mr. Hubbard, and the key provider of tourism facilities in the district.

NATIONAL TRUST: I won't get into our tourism business is bigger than yours sort of debate this morning, but in terms of activity --

THE CHAIRMAN: I think you already have.

NATIONAL TRUST: The point is made. In terms of tourism, the first thing I would like to say is next year will be 100 years since we had our first property nationally, and that was within the National Park. That leads me on to make the point that the tourism basis, certainly within the National Park and indeed around it, where we have succeeded, we feel is based upon longevity and upon long-term values. It is the things which are distinctive and which are different about the Lake District which will bring people back.

Mr. Greenwood talked about the number of businesses which have struggled and there has been a high turnover in certain areas. The things which stand and which will last for a long time are those things which bring people to the Lake District because of what it has to offer. I will perhaps talk a little bit later about what those characteristics are in some detail, but it is that distinctive offer.

One slight warning, and I guess it may not be a planning matter but I will try and illustrate it is that raising the quality is right. We are certainly raising what we are doing, our visitor expectations have changed over the years. We are not complacent but continually adjusting, but, if you are not careful, you can actually lose the essence of where you are going.

The best visitor experience I have had in recent times in terms of accommodation was staying at a farmhouse near Coniston, where the walls are oak plank. You can hear everything that is going on next door if you want to. But thank God there is not a tea and coffee and TV in each bedroom. You go down and have a social experience with the farmer, the farmer's wife and other visitors, and then a decent social gathering as well. The last thing we want is raising the quality if it means like tea and coffee in every room and a trouser press for everybody.

GONW: I think Mr. Hubbard has pointed to one of the characteristics of the Lake District which is that you do have this contrast between the mass tourism you see in places like Bowness and the quiet enjoyment, so to speak, that people go to places like Buttermere. Perhaps Enderdale is quieter still, but you know what I mean, I am sure. And of course Mr. Greenwood, I dare say, wants to preserve that.

We have not really taken a view on these policies, but you have pointed to policy EC 9, and that does refer to development plans, "encouraging growth of and investment in tourism within the northwest". It is also phrased very much in the way of looking at other agencies rather than just development plans, and that is an important point, because this is an area really where you might say planning authorities should take care to defer in some ways to the knowledge of people who know about how these things work. Not much government guidance on tourism, of course, the actual PPG on tourism. I can't remember if it has actually been scrapped yet, but certainly that was the intention, because the kind of themes picked up in guidance elsewhere on economic development and transport and such like, but there is quite a lot on tourism in PPS 7, and that does refer to things like ensuring that planned proposals for large scale tourism and leisure developments in rural areas have been subject to close assessment" etc. But it does actually make the point that you might want large scale tourism and leisure developments in rural areas. That might be the best place to put them.

So far as the Lake District is concerned, of course, the most popular parts of the Lake District are quite congested, and I think it has been part of the philosophy of catering for tourism for many years, that you try and direct people into the areas where lots of people want to go, and if they then overflow you have to look at attractions elsewhere, which perhaps may well be on the fringes of the Lake District as well as within the National Park. Of course Mr. Greenwood is representing the Cumbria Tourist Board.

So far as the policies are concerned, it did occur to me, reading some of the representations that have been made, that they perhaps do read as a little bit grudging. That perhaps does not entirely fit with the spirit of doubling tourist spend in Cumbria when you are talking about "the future development should be based on visitors' enjoyment and understanding of the National Park's distinctive environment etc. Well, of course it is. But that does not mean necessarily that you can't have other things in and around the National Park which might attract people.

The question of what type of accommodation you have is also important with the change in people's expectations. The development of things like Center Parks developments, of course one does have that kind of thing again on the edges of the Lake District.

But to summarise, I think we would agree on reflection that these policies should perhaps be phrased more positively, perhaps more accommodating of the kind of initiatives that Cumbria needs. Bearing in mind that diversity of people's expectations of what they get from Cumbria, be it a boat ride on Windermere or staying in a strange farmhouse by Coniston, or striking the Fells, or whatever it may be. I feel I was beginning to ramble a bit there. In summary, PPS 7 does give that slightly more positive thrust, I would suggest.

THE CHAIRMAN: We will come on to the actual specifics of the policy. I am sure Mr. Greenwood has some specifics he is going to bring to us as well. Just to round off this general discussion, which seems to be more a singing from the same hymn sheets, I guess.

MR. GIBBS: I have one point to throw in because it does not seem to be in the plan, and that is the international damage. One of the things that strikes one coming to the National Park is probably the most visited tourist site in the National Park is the service centre on the M6, which does in fact have the advantage of being the best service centre in the whole of the United Kingdom. That is very useful to the rest of the Lake District.

The second point I was going to make is that if you look at the young people coming to the Lake District -- or at least there are two categories of people at this time of year you see around. They are the elderly and energetic and the young and Japanese. How much work has the tourist board done on literally the Japanese reaction to the Lake District? What it is they are looking for apart from rediscovering their experiences in primary school, when they were introduced to the English language by Beatrix Potter. What are the other things they want to build on upon there. Does that lead to dimensions of strategy about the sort of facilities the area needs to have in order to create that generation of people who will come back as elderly Japanese to experience

the other things they found in the Lake District when they came here to look for Beatrix Potter?

CUMBRIA TOURIST BOARD: It is a nice timely reminder that, as you say, part of the Lake District National Park and the wider Cumbrian appeal is an international one. The number of foreign visitors that the Lake District and Cumbria as a whole attracts is relatively low by comparison with a lot of other parts of the country; the Londons, the Edinburghs, the Baths and that sort of thing. It is not quite on many people's stopping grounds. So it does hold some new opportunities to tap into those markets.

There is an annual foray to Japan, which is organised both by the Local Authorities and Cumbria Tourist Board and the private sector, to market the Lake District to that very specific audience that loves and has grown up with Beatrix Potter and some of the other nice things it likes about the area. The Board's also done some research that suggests that they should be tapping more into German and Dutch markets, into the Chinese market, parts of southeast Asia, as well as, of course, North America. So they are looking at what the expectations of those visitors are. On the one hand it is the quirky things such as the bed and breakfast that you talked about near Coniston, but it is also quite often an extremely high quality experience from transport facilities right through to the car parks, the toilets, the shops, the restaurants. There is a really patchy performance there. Again we come back to the quality theme.

I am sure there are other parts of the Japanese market we could be reasonably tapping into, but at the moment our efforts are largely to do with marketing on-line booking, producing print in Japanese, and even, I think, talk of some of the signposting being in Japanese as well.

THE CHAIRMAN: Could I bring in Helen Houghton from the Park Authority.

AUTHORITIES: I would really like to respond to a number of issues that have been raised up to now. There has been a quite a wide ranging discussion going on. Partly to just to thank Richard for his summary of the key trends which are occurring in tourism have been picked up in the Joint Authorities' statement on page 4. I think again there is now acknowledgement that there is significant change in tourism within the county and a number of recognisable changes, shifts, trends, within both the profile of visitor and in terms of the activities of visitors.

Just to add to that, the County Council districts and a lot of other partners within the county are taking part in joint research projects. There was reference to some specific research earlier. Again there is a general feeling that there is a real value in doing joint research projects.

In terms of sharing base line information -- because we have heard over previous days in the examination in public that there is obviously a need to base policies on substantial and robust evidence -- we would like to think that particularly in this own section that has been the case. In terms of collusion of specific projects, we have not referred to those, but I think there are, and again there are an awful lot of projects ongoing, and in particularly new projects that have come up very recently, but I think there are a number of principles that have arisen from those, and one of them is the

emphasis on quality. I think we would, all around this table, recognise that quality is an issue. It does have to be addressed, and that we would all agree that we should try and make that a priority, and we have reflected that in the tourism policies, both for the county, on a county wide level and within the National Park. I think that is probably all I would like to say.

NATIONAL TRUST: Just to supplement Mr. Greenwood's comments, we have actually, apart from very much according to what they have been doing abroad, we have certainly ourselves, it may have been as part of one of one of his initiatives, entertained Japanese over here at Hill Top. So they are actually coming and taking an interest in developing the market in that way.

It did just occur to me whilst I was thinking about that, I remember back in the 70's when Vindolanda was being developed on Hadrian's Wall, the expectation then that there would be a massive Italian market coming over, in terms of the last outpost of the Roman Empire. It happened to an extent, but not to a large degree. Maybe they had a push with the walk now being complete all the way across, but I think it is still going to be, from our point of view, something that is, I would not quite say a niche market, it is more important than that, but nonetheless that the home market is going to be the bread and butter.

FLD: Two points, if I can. One is to respond to Mr. Gibbs's point about the international damage. When I was over in Japan a few years ago, I learnt that only about seven per cent of Japanese had passports, and that was before the recession. But I understand from a recent talk from the Chairman of the English Tourist Board that they are a little bit despondent about the future Japanese market, and they are closing their main tourist office in Tokyo and, likewise, they find that the other high spenders who come to this part of the world, the Americans, are coming in less numbers, and that the major marketing is likely to be towards the Europeans, particularly with the extension of the European Community, but the Europeans appear to be a lot more careful with their expenditure patterns. So it gives extra challenges to the Tourist Board to raise their objectives in 10 years' time. One point Mr Bamber made, bringing in PPS7 at this stage, is that there is one word in PPS7 which does not appear at all in any of the tourism policies, and that is the comment about the word sustainability, because even with quality I think all of us would be looking for a sustainable tourist industry in all aspects of that word; not just sustaining the businesses, but sustaining the landscapes and the local communities. I think it is important that when we think about renaissance policy, whatever it may be, the word sustainability has to be thought about.

THE CHAIRMAN: Mr Wilkinson.

WINDERMERE LAKE CRUISES LTD: Just commenting really on Mr Gibbs and the focus very much on the Japanese market, and if Mr Smith had been able to join us this morning he would be able to tell us about his trip in the last couple of weeks to the Far East, and it's not only the Japanese market that we are looking at; we are actively promoting to the South Asian market, and we see the Lake District as attractive very much to the Indian market where it is the peace and tranquillity that is being proffered rather than necessarily Beatrix Potter and the Beatrix Potter connection. And looking forward, certainly the Chinese market, as travel becomes

more widely available, and that's a thing that has been picked up in the Indian market, that for the first time we have produced this year in addition to the Japanese leaflets and the South Asian leaflets, we have published specific Chinese leaflets. But in order to attract these types of visitors, people in the area have to work with the inbound operators in the UK, because one of the things that is very much at a premium for these visitors is time, that the visit to the UK as a destination is very short, and again this comes back to the theme that in order to attract them, the quality has to be there, that it can rank with the visitor experience. But again picking up Mr Brodie's comment, we would totally endorse sustainability as an underlying factor to that development.

THE CHAIRMAN: Mr Pealing.

RURAL REGENERATION CUMBRIA: Following on from that, I mean the interesting thing about this is of course getting people into Cumbria and the Lake District, both internationally and nationally. Less than 10% of visitors to Cumbria are international visitors, and I suspect that that proportion probably won't change, but an issue is getting them in - I mean, by and large I suppose they fly into either Heathrow or Manchester - and maintaining their way to Cumbria en route to Edinburgh or wherever. But if you look at the other 90% of the market, the domestic market, a significant potential growth area there is London and the South East. I mean, Richard Greenwood will probably have some figures, I don't have the figures to hand, but a relatively low proportion of UK visitors are from the South East of England, and part of the reason for that is the difficulty of travelling to Cumbria with a short break destination. The difficulties of travelling on the west coast mainline are well known, but clearly if you can't rely on the train service to get you to Oxenholme in 3 and a half hours from London on a Friday evening, then that makes a short break somewhat untenable. And I would link this to the idea of trying to open up air facilities in Cumbria, and the discussion we had last week concerning Carlisle Airport, and the importance certainly that the regeneration agencies place on trying to get scheduled air services into Cumbria through the expansion of Carlisle Airport which could significantly change the perception of short stay holidays from the South East of England into Cumbria.

THE CHAIRMAN: I think we will move on from this general discussion down to the specifics. Mr Bamber.

GONW: A point I neglected to mention, which occurred to me when Mr Greenwood was talking, but first of all I should say that the National Trust perhaps failed to attract Italians to Vindolanda because so far as I can remember Hadrian's Wall was garrisoned by people from the Balkans, and that may be a growing market. My point relates to what planning system can achieve with relation to tourism and of course a lot will be achieved with the Tourist Board working with funding agencies such as the Development Agency in improving the offer in terms of accommodation and attractions. One planning intervention which tends to be more successful is in the public realm, and that relates to the point of the Lake District looking tired, and so far as I remember the structure plan doesn't say a great deal about that, and ultimately it is down to district councils and their local development documents, but it is noticeable, quite apart from places like Manchester which attract increasing numbers of tourism and have majored on quality in the public realm and architecture, places around the Lake District like Whitehaven for example are working very hard to improve the way

they look, to make themselves more attractive to wander round, and I presume that that is a district council responsibility as much as a National Park responsibility, that kind of thing doesn't seem to be happening within the towns within the National Park. What you might wish to say about that I am not sure, but that is the kind of thing that the planning system can do something about rather than the policies which are in here which relate to development which it is controlling or regulating, and hopefully encouraging of course.

THE CHAIRMAN: Yes, we do hear that. I will just bring in Elizabeth Jackson, do you particularly want to respond to that point?

SLDC: Yes. Just moving on from the point that Chris Bamber has just made, that is one of the reasons why we wanted Windermere, Bowness and Ambleside to be key service centres identified in ST5 because of the work that the Lakes Market Towns Initiative can do in regenerating those areas and improving the tourism offer, the quality offer, be a regeneration in those areas. It is really supporting just the point that Chris has made.

THE CHAIRMAN: It was a point I put in my agenda under question (b), role of key towns and service centres. We could come back to that. We obviously have discussed this last week. I think we will come back to that if that is okay, but I hear what you are saying. So I think there seems to be agreement around the table that the focus for the future should be on the special characteristics of the Lake District and Cumbria as a whole and build a quality experience in the round so that people have good car parks, good loos, good tea shops, etc., etc., as well as good accommodation; the whole experience should be one of quality and enjoyment. Need for investment has come up quite strongly, and the fact that there is no room for complacency and sitting back and waiting; there is a need to do something, to take action. And I think this theme renaissance in a sense encapsulates that in that you are building on something, you are looking for some kind of rebirth or regeneration of the tourist experience as a whole. I think that has been helpful. I would like to move on now, getting a bit a more specific, and some of it is quite detailed, but I would like to go on now just to look at the two policies in the plan which concern tourism, EM15 and EM16. I have just got one particular compare and contrast point to bring out here, which hopefully will be relevant to what we have been talking about in general terms, and that is that EM15, in the second paragraph there is a reference to development enabling economic and physical regeneration. Now, EM15 deals with areas outside the National Park, it deals with the rest of Cumbria, but it does include the AONBs. The same wording doesn't appear in EM16 which deals with the Park itself. And my question really, and perhaps I should start with the National Park Authority, as to why there is this difference, and whether or not having a mention of economic and social benefits would be helpful in the policy dealing with the Park. Elsewhere in the plan there is reference to the need to revitalise the economy in rural communities in the Park, and also in the circular which provides a framework for the Park, and you are more familiar with this than I am, and there is a duty to seek and foster economic and social well being of local communities. So I am just curious to know why that phrase is in one policy and not in the other, so perhaps, Helen Houghton, could you start us off with this.

AUTHORITIES: There is actually a reference in paragraph 3.23 to the structure plan directing new tourism development towards areas where there is a need for

regeneration and economic diversification. That is meant to refer to the whole of the county including the National Park. There is no deliberate policy or reason why that wording wasn't exactly reflected in EM16, but it is meant to cover the county as a whole, and it has actually been picked up in the statement by the two authorities again in relation to county-wide tourism development rather than just the National Park.

THE CHAIRMAN: So given the appearance of the principle earlier on, are you saying that you wouldn't have an objection to it being included in EM16? It would seem to tie the whole thing together a bit more clearly.

AUTHORITIES: That is correct.

THE CHAIRMAN: Mr Greenwood.

CUMBRIA TOURIST BOARD: That is certainly something that the Board would support, because economic and physical regeneration could certainly reflect the fact that Windermere and Bowness and Ambleside are part of the Market Town Initiative and therefore there is an opportunity of resources there, but the mere choice of those settlements as part of the Market Town Initiative suggests there is a need for regeneration, not simply in terms of the economy but also in terms of the build fabric, car parks, parks, and also of course those towns will be most affected one imagines by any economic impacts arising from the introduction of a 10 mile an hour speed limit, which kicks in next year on Windermere, and certainly the research that has been carried out back in 2001 suggests there will be a loss of jobs, up to 200 jobs, and there will be an impact on secondary businesses as well. So regeneration I think is an appropriate theme for policy EM16 as well.

THE CHAIRMAN: Could I bring in David Brockbank. Can I just clarify that this morning you were appearing for Rural Regeneration Cumbria, and in this session you are appearing for yourself?

DAVID BROCKBANK: Myself. I would just like to agree with your point and concur absolutely that tourism spend and the tourism industry has this huge multiplier effect for the county, so not only is there the direct benefit of the tourist spend, but there is also the other spin off industries which help to sustain the communities within the county and in particular within the National Park. The other districts and the County Council all have economic development officers or regeneration officers. They all take a very good active, proactive, role in economic and tourism development within their particular districts, and the county as well for the county. The National Park Authority has no economic development officer. It has an economic duty, as you have just announced when you made the point that the economic and physical regeneration should be included in their policy, and really they ought to engage economically, they ought to have that reinforced by including it in the structure plan, and I agree with the point that you have made exactly.

THE CHAIRMAN: And that point has been accepted by Helen Houghton. Do you want to add to that?

AUTHORITIES: Yes. Thank you. I would like to just add to that, because there is, in circular 12/96, a very clear statement in paragraph 22 which refers to National Park Authorities carrying out the duty to foster economic and social well being in ways that

are compatible with the pursuit of National Park purposes, and again the point is made that we are not obviously the economic development agency, we don't have that role, and therefore in terms of other districts and economic development officers, we wouldn't be expected to fulfil that requirement.

THE CHAIRMAN: I mean, it is quite clear in the circular that you have a duty to look after the environment, if I can summarise it in that way, but within that context you also have duties to look after the well being of the inhabitants, so I think that is quite clear and you have made the point that you would welcome the inclusion of that phrase which is in EM15 in EM16 as well, which would clarify things and could be helpful. Could I bring in Mr Brodie for the Friends of the Lake District.

FLD: I think Helen has now answered the points I was making about paragraph 22 and 'ways that are compatible with the purposes of the National Park' is a key phrase in there, and also the s.62 duty which reflects from that and on people like the Tourist Board and other local authorities in carrying out their work. It is a dynamic process, a two-way process. But I am just a little bit confused, Chairman. You quoted the second paragraph of EM15 and asked why it was not in EM16 in essence. My understanding is that the direct answer would be because at that time there were no key service centres in the Lake District. And I think that whilst we would have every encouragement to have the regeneration issue positively put into the National Park major towns, we would still have, as we expressed earlier in the EIP, reservations about key service centres being transferred across to that. And to back that up, I am reminded of the recent decision by the Minister in designating the New Forest National Park, where he drew the boundaries to exclude areas which we would probably in this context define as the key service settlements; in other words, he expected, my understanding of the decision, that the major population areas would be kept outside the New Forest, and therefore we would have a little bit of reservation in the transfer of the key service centre concept to Ambleside and Windermere and Keswick. I think to develop it a little bit further we recognised that the current local plan for the National Park is more permissive for tourism and developments in those settlements without them being key service settlements, so I think we can achieve what the Tourist Board and the other economic development people want within the policy as it stands without them becoming key service centres.

MR GIBBS: We are not intending to reopen the key service centre debate. Obviously different geographical areas have different geographical characteristics, and we are not going to import reasoning from the New Forest to the Lake District directly. There are important centres within the National Park. I think the suggestion is that in the context of that the second paragraph of EM15 has as much relevance in EM16 as it does in EM15, and if you are trying to suggest that it doesn't it would be helpful to know – no, you are not, right.

FLD: Sorry, Chairman, I was hoping to support that but without the phrase of 'key service centre', that was all.

MR GIBBS: I did think you were trying to reopen the debate which I think we have had, and obviously the joint authorities will be able to take on what our view is, but we have basically had that key service centre debate.

THE CHAIRMAN: I would like to move on now to my second question. I think we seem to be in agreement on that first point. The second point, I want to go to RPG13 and policy EC9, and the third paragraph, which says, “development plans should identify provision for new facilities that generate significant numbers of tourist trips in appropriate locations. In identifying such locations planners should give priority to areas that have existing major tourism and leisure attractions and facilities”. And my question is, and I don't know how optional this is, perhaps Mr Bamber can advise me, but it is a clear message coming out of RPG that it expects development plans, the structure plan, local plans, etc., to identify significant major projects or initiatives, and perhaps this is part of the question about how positive enabling the plan is, because the plan doesn't actually identify any new initiatives specifically. Now, having heard Mr Greenwood, there are obviously lots of pots boiling, various projects under way, many of which go much wider than planning, they are to do with marketing and branding and stuff like that, but there are things which we have already touched on which are clearly relevant to planning, and I am just looking at the locum report which I referred to earlier, published in February 2003, core document 135, and on page 30 that refers to a number of items some of which could be relevant to planning. This isn't obviously policy, it's a consultant's report with a series of ideas, but it includes things such as visitor centres, park and ride at key gateways, upgrade of main visitor centre, radically enhanced public transport, improving the building and environment of resorts, which I think is the public realm thing we were talking about earlier, strategies to develop and promote high energy and low energy dimensions for tourism, high quality cultural building in the central lakes – that was a specific idea – and improve pedestrian and cycle access to traffic free environment. So a series of ideas that have obviously been around for a little while, and the renaissance initiative is picking some of those up. And I was really in some ways a little bit surprised that given the significance of tourism, and obviously there are different forms of tourism in the North West, which we have talked quite a bit about – urban tourism in some of the main centres and the cities in the North West – but given the significance of Cumbria in the North West, it seems surprising to me that there aren't any specific projects or initiatives brought forward in the plan in response to this request or invitation or instruction within RPG. Now, I think the two authorities in their response said that this is something that should be left to local development documents, and I can see obviously there is a role there for local development documents in coming forward with specifics, but going back to our earlier discussion surely there is something the plan should be doing as well in flagging up and highlighting some key projects or key initiatives to set an overall context. Really I am trying to provoke you to agree or disagree with me. That is a view that could be taken in terms of reading locum and reading RPG. I would like to open up discussion on this and perhaps say that I was thinking myself, ‘Well, what could actually be brought forward?’, and one of the ideas I was thinking about was the canal which I don't know a great deal about, but it struck me as being maybe an example of something that could be flagged up. Could I bring in Mr Evans first for Allerdale.

ALLERDALE BC: I hesitate to answer for the joint authorities, but there is a policy in the structure plan which reflects RPG in the terms of regional parks. And I would like to flag up, or at least try to sell the idea of the West Cumbrian Regional Park, and one element of that which we see as being the Derwent Forest proposal, and certainly if the structure plan were to flag up that as a potential scheme, then certainly we would support that. We see the Derwent Forest proposals as fitting in nicely with the

both physical regeneration and economic regeneration issue that is mentioned in the policy.

THE CHAIRMAN: Frank is just helpfully pointing out that is actually there and is listed in policy L58, but are you saying you want more than just a mention in that context; you would really like it being highlighted as a key tourist project?

ALLERDALE BC: I think we would like it, sir. It might not make all that much difference, but certainly we would support it being highlighted, yes.

THE CHAIRMAN: Could I bring in Martin Clark from British Waterways.

BRITISH WATERWAYS: You actually picked up on the point that we were certainly trying to make in the further statement that we made that is contained in the EIP document 6, and we do understand the response from the joint authorities, but we are nervous, and I think this was picked up by Hal Bagot in the earlier session. If I can explain a little bit about what we would see the nature of the canal restoration, I think it should be looked at in the context of restoration and rural regeneration going hand in hand, because the funding that will be required to restore the canal and how that will be delivered will only be viable, and its sustainability when the canal is opened, in relation to the benefits that would accrue from waterside development. So without the waterside development, at present, and the way in which canal restorations are certainly going, the two actually have to be seen together because it is difficult with funding to pump in tens of millions of pounds to a project that private development could benefit from because of the increased money that it creates. I will give a specific example of how it might have picked up on this. There could well be a situation where in open countryside you may regard adjacent to a section where the canal is filled in at the moment so the canal is not there, it is where the route of it used to go, and something like a new marina with associated facilities for boat repair, chandlery, a pub, a hotel, car parking, that and facilities like that are going to be essential to the sustainability and the initial deliverability of the canal restoration because the public sectors like the NWDA won't put money into a scheme unless there are clear benefits, and if I refer to paragraph 3.25 which says they (presumably developments) will be supported where the scale can be accommodated without adverse effects to the character and amenity of the local area. So we understand the response that we were given, but the canal restoration is a significant huge project and we are confident that South Lakeland Council and various other partners to the project will see that through, but it would have been nice from our point of view to have it reflected in the plans that we are looking at today.

THE CHAIRMAN: Yes, 3.24 gives you an enabling framework for what you are proposing to do but my question was whether this was a flagship project that should be identified. I have you on that. I would like Mr Greenwood's opinion on that and also South Lakeland but before that can I bring in Mr Bamber for GONW.

GONW: I'm sorry, sir, I have forgotten what I was going to say. Can someone else rescue me!

THE CHAIRMAN: It was possibly in relation to EC9.

GONW: Yes, it was, it was this word provision which ranges from instructing development plans to take account of things which we know there is a need for and which are likely to happen such as a conference centre or arena in Liverpool or a resort casino in Blackpool and perhaps the Lancaster canal but also going along the scale it would, in my view, include policies in development plans saying what they would do if proposals for new facilities should come up and that goes back to the link in the earlier paragraph of partnerships developing local tourism strategies. The plan should perhaps accommodate the knowledge that these things are being developed in Cumbria and they may well come up with things and one needs perhaps a steer on how they will be dealt with rather than identifying things which the planning system couldn't deliver of itself.

THE CHAIRMAN: Are you agreeing that as well as the facilitating paragraphs in the plan there should be something that picks up this point in RPG and seeks to identify some key projects?

GONW: From what we have heard that may be helpful. It is no use coming up and saying, "We think there should be a theme park in Grasmere," or whatever but if there are things which are coming through which has a business plan in preparation or are identified then, yes.

THE CHAIRMAN: That would help to give the plan a more positive and less grudging feel?

GONW: Indeed.

CUMBRIA TOURIST BOARD: I have some sympathy with the joint authorities here probably because there aren't many projects which are at a sufficiently advanced stage in terms of their feasibility to earmark with the specific exception of the Lancaster Canal Restoration scheme. However, there are a number of generic programmes and projects which could be mentioned such as Park & Ride which the joint authorities have been grappling with probably for a decade now, harbour improvements to accommodate cruise ships and marinas and things like that. Perhaps things like major car parks and tourist facilities. They most definitely help from having a specific mention.

THE CHAIRMAN: What about the Renaissance Project?

CUMBRIA TOURIST BOARD: I am assuming that the Renaissance Project would feature in the plans as a result of our discussion.

MR GIBBS: The other omission is the dimension of the eco-tourism dimension. Is that something that you are working towards? It may not be a word that people like. It is a word that I quite like as opposed to other words which we have had earlier on. There is no coverage in the section on tourism. They are talking about tourism that reflects on the qualities but they don't use the term which is a generally understood term. Is there any dimensions in that programme that have evolved in that area?

CUMBRIA TOURIST BOARD: Yes, there is a scheme which is being rolled out called responsible tourism. It would be excellent if there was some reference to that

as well. I am assuming you are referring to that sort of project where we are working with industry, attractions, accommodation to improve their credentials rather than introducing an entirely new attraction based on an eco tourism theme.

MR GIBBS: The attraction is there. It is how you make use of it.

CUMBRIA TOURIST BOARD: I am well aware that Doncaster's earth centre has had to close in recent months.

MR GIBBS: I wasn't thinking of an Eden project but much more small scale stuff. I will be interested to hear what the National Park has to say on that.

THE CHAIRMAN: I did invite South Lakeland to come back on the question of the canal and whether it was sufficient to have it dealt with in the local plan or whether some reference in the Structure Plan would be helpful.

SOUTH LAKELAND DC: From the council's point of view it would be helpful if we could have some reference to it in the Structure Plan. At the local plan level, in the LDF framework we do propose to have an action area plan for the Lancaster Canal Regeneration that falls in our district. It would be helpful to us to have some mention of it in the Structure Plan.

THE CHAIRMAN: I will turn to the joint authorities in a moment but before we round this off, if there are any other significant key projects which people think might be candidates for a mention now is your opportunity. Mr Pealing?

RURAL REGENERATION CUMBRIA: Before the joint authorities come in I want to try and map out some of those ideas that you were talking about. I agree with Mr Greenwood that we have some difficulties in stating some of the potential projects in the Structure Plan because a lot of them are at a formative stage but clearly there is the recognition as Richard Evans has said that the Derwent Forest scheme in terms of a regional park and as a potential for development within the park is extremely important. It is a key project in West Lakes Renaissance ten year strategy and NWDA have allocated funding to that strategy and by implication the development of the regional park. In Barrow the regeneration proposals for the dock area include the cruise line terminal as one of the first phases of that and reference could be made to that. Rural Regeneration Cumbria are very supportive of the Lancaster Canal project and along with the district council are working hard to try and achieve that. Interestingly, that project because of the large amount of funding that is required to develop the whole scheme, 15 miles of canal across six major road crossings, three being the M6, the total cost of the scheme is in the order of £60m which isn't fundable in one chunk and we have looked at reversing the flow of the scheme. So the first phase will take place in Kendal itself and would potentially be a major brownfield urban regeneration scheme in Kendal and would redress some of the issues that we have talked about previously. Then the South Lakeland Gateway project which has been mentioned in previous days, the potential for a major gateway into the National Park, would have other activities surrounding it besides tourism but clearly tourism is an important element of that and potential park and ride.

Interestingly, all those schemes are outside the National Park but within the National Park there are a number of other schemes that have been implemented or are being implemented which go along with the rural renaissance programme. One of those is trying to improve the attractions in terms of both low and high energy if I can term it like that. In terms of low energy in terms of some major visitor attractions in the National Park then quite a lot of work has been undertaken in the last year or two. The Wordsworth Trust at Grasmere have a major extension to their facility which took some while to come to fruition including to go to appeal. There are a number of other schemes that have been implemented which is all about improving the quality of tourists and visitor attractions. Blackwell near Windermere with the arts and crafts house, a major tourist attraction for the arts sector. Another interesting one which is on the horizon is about bringing back Bluebird to Coniston and extending the existing museum to house a rebuilt Bluebird which is quite exciting.

In the high energy sector it was mentioned last week that Keswick is the capital of the outdoor clothing district but there is an idea that Keswick could form the basis for a high energy sector. There is already a number of businesses in Keswick which offer those type of facilities and to build on that the Forestry Commission are looking at the idea of putting in mountain bike trails in Windlatt Forest and they are also looking at major improvements to the visitor centre and facilities within Grizedale Forest which is east of Coniston.

Another thing that Rural Regeneration Cumbria is involved in is trying to improve the facility in terms of outdoor recreation and management training. Cumbria, because of its geography, is clearly an important location for outdoor recreation. The Outward Bound Trust has its headquarters here. Working alongside the university of central Lancashire we are investing in a new centre at Newton Rigg to provide a training facility for higher education. So there are a number of initiatives going on which all fit into the Lake District renaissance programme about improving the quality of both low and high energy sectors. That does not involve major development within the National Park but it will involve some changes and I am sure FLD will have some views on that. That is just a flavour of what is happening.

THE CHAIRMAN: Claire Savage from Barrow?

BARROW BC: Going on from what Mr Pealing said, we would wish to see priority programmes that we have within Furness and east and west Cumbria in terms of regeneration programmes and the tourist elements that we are hoping are going to come forward as within the Structure Plan are going to be listed as well. The cruise ship terminal has been mentioned and that will have significant benefits both to the economy of Furness and West Cumbria and the wider area of the county as a whole including the National Park. It would increase visitor numbers both nationally and internationally to the area and I would like to make the point that although regeneration and tourism appears later on in the agenda, a lot of the discussion this morning has been based on the Lake District National Park as one would expect given that we are in Cumbria but it is important that the regeneration of Furness and West Cumbria and the benefits that we can tap into in both ways. Barrow has tried already to market itself as a wet weather destination for the Lake District. Hopefully with the cruise ship terminal coming on line we will be able to tap into some of the tourists that may not see the light of day in Barrow if they were accessing the area either by other

links or motorway. We want to reiterate the point the importance of the regeneration initiatives on that side of the county and the effect that they will have on the National Park.

THE CHAIRMAN: We have four possible big stories so far. The Derwent Forest, the Barrow Dock regeneration including the cruise ship terminal, the canal and the renaissance initiative which is more diverse which includes a public element and a planning significance as well. So there are four possible candidates which I would like a response from the joint authorities on that. These seem not to be too speculative either. Work is going ahead, things are happening. They are not like some blue sky initiatives. So I will ask Mr Hubbard if he has any additional ones he would like to put on the list.

NATIONAL TRUST: The short answer is no but I would like to take us back to the starting point of the discussion which is policy EC9 and as a minor aside almost EC9 has references to facilitating development. It is tourism and recreation facilities in themselves. I want to take you on three paragraphs beyond that on page 39 of RPG which I will read out, it is only one sentence, "Development in and around regions of best valued landscape should be considered in accordance with the core development principles and policy ER1 and ER2." We are well aware of the general approach to sustainable development set out in the core development policies and issues about climate change.

If we can turn to ER1 and ER2 on pages 77 and 78 I would remind people the importance that is given there to positive management and the protection of the built and natural historic environment and taking an integrated approach and, particularly in terms of ER2, the question of landscape character and the impact upon landscape character. The concern I have is that I am not aware that the projects that have been mentioned have been sufficiently developed to be considered in terms of those tests which apply and therefore it is inappropriate to include them within the JSP at this stage. There is some more work that would need to be done to make sure they have been properly tested in those ways against those particular policies and indeed the core development policies.

THE CHAIRMAN: I don't know who wants to go first? Mr Fairlamb?

AUTHORITIES: To pick up on some of the key points and firstly go back to policy EC9, it was mentioned in the debate but it is important to remember that this policy isn't just land use and this was an issue we had to face in drafting the Structure Plan that we wanted to focus on the land use development aspects and particularly on the reference in the second paragraph to locations. We feel we have identified appropriate locations through policies in the Structure Plan but particularly 15 where we are catering for tourist development and growth and there is an enabling element to the Structure Plan.

The other issue is in terms of the reference to development plans in that paragraph of policy EC9. There are two elements to development plans. There is the Structure Plan and the local plan or there was at the time of this Structure Plan and we wanted to focus on the location of enabling aspects as opposed to identifying particular sites which clearly traditionally has been a role for district councils in their local plan so

that is why we have held out mentioning specific sites. That said, when you look at the Structure Plan, particular flagship projects have been mentioned and looking at Derwent Forest there is scope in the regional park policy L58 which allows for leisure and tourism open space to be developed. The canal has specific mention as a transport scheme in schedule 2 and also there is provision for developments which require a rural location. With reference to the Barrow port and docks, this does have quite a number of references in ST9 which refers to coastal towns, marinas, harbour facilities. So we feel that those particular project are accommodated without specific reference.

To highlight the reasons why they are not specifically included, obviously they are time sensitive and we have seen a number of projects that have been promoted as offering the future for tourism but for viability reasons or other things they have suddenly disappeared. There is the issue of how comprehensive the list is and again others may say if you are going to add these four, I can give you a fifth. We are often in that debate as well. They are two cautionary words on mentioning specific projects.

However, if the general feeling is that we recognise that there are projects then the two authorities are willing to work with Cumbria Tourist Board and others to make up a list of major projects which will see the light of day through the Structure Plan period and that are well advanced in their preparation. There are issues with the canal in terms of allocation and development that have not been fully tested and the place for that is to be presented as a package of measures to be presented in the local plan or an area action plan. There are other ways of overcoming these developments and other planning tools and mechanisms for doing it. That said, if the Panel feel there is a need for raising the profiles of these projects that is something we would look at.

THE CHAIRMAN: You are looking towards something that could go in the adopted plan?

AUTHORITIES: That's correct.

THE CHAIRMAN: Helen Houghton?

AUTHORITIES: I would like to go back to the point about eco-tourism. A point to make is that any development within the county has to be linked clearly with the special qualities or distinctiveness of that part of the county, be it the National Park, AONBs or the area outside of those designated areas. Richard Greenwood referred to the responsible tourism scheme and that is a very good example of ways in which we can ensure that tourism is sustainable and there is a clear reference in paragraph 3.23 to the fact that tourism should be developed in a sustainable manner. A lot of the initiatives are delivery initiatives as opposed to policy but there are a range of those.

I want to pick up on the Rural Regeneration point on the Lowcombe Study and their recommendation of low and high energy areas, particularly within the National Park and the reference to Keswick. One of the longstanding policies of the National Park authority is to provide a range of provision. There is a very close link between provision for tourists and general recreation activities a lot of which are informal activities. So it is to provide a range of provision across the whole of the National

Park and again that is very clear guidance that we have been given on that since the parks were designated. We have a responsibility to make that provision as socially inclusive as possible. There is point that goes back to section 62 of the Environment Act. It has recently been highlighted in the DEFRA review of National Park authorities, there is an onus on all the bodies and authorities whose activities affect the National Park to ensure that social inclusion is taken into account. Rather than focusing on particular settlements or particular areas of the park for certain types of activity is not in accord with general policy.

There was a mention of Winlatt and the mountain bike centre. It is not appropriate for me to comment on that, the application is in at the moment, except to say that any application of its kind which focuses on one type of activity has to be looked at in a regional context particularly and an examination of suitable sites and one of the main factors is the sustainability of any type of attraction facility, et cetera.

MR GIBBS: In relation to what you are saying about the ecological impact, you are saying it is implicit within your statement that you are in support of low ecological impact. I can see merit in making it explicit because the policy is phrased in such a “thou shall not” approach. Would it be counter to your intentions of the policy if it said something like tourist initiatives with low ecological impact would be welcomed?

AUTHORITIES: In terms of EM16 this reference to special qualities of the National Park and we have referred in the joint statement to the National Park management plan and the identification of those and obviously ecological impacts and factors are one of the things that we would want to get out.

MR GIBBS: I am getting exactly the reaction that Brian Barden was getting. You say obviously. I don’t think it is obvious because of the language that you use. Obvious means saying it and you don’t say it. You imply it.

AUTHORITIES: We do refer to the environmental and cultural historic character of the county and within that environmental character there are implicit references to—

MR GIBBS: Absolutely, implicit references.

AUTHORITIES: I am being advised by a colleague that we would consider adding text to make that explicit.

MR GIBBS: What I am concerned about is that it is implicit. It is not made explicit and the advantages of making it explicit are in terms of presentation and the feeling that people have about what the National Park are trying to do.

THE CHAIRMAN: It is past one o'clock and I would like to round this session off but I want to give Mr Evans and Mr Greenwood an opportunity to speak.

ALLERDALE BC: In response to Mr Hubbard’s point and speaking with my local planning authority hat on, Allerdale would have no problem with Derwent Forest appearing in the Structure Plan. There is a policy in our adopted local plan enabling development at Derwent Forest. An awful lot of work has gone in terms of ecological

and environmental impact and without prejudicing any future planning applications - we haven't had any yet - we are happy for that reference to be made.

CUMBRIA TOURIST BOARD: Just to address the question you raised on the four possible candidate sites that get a specific mention. If you look at three tests; best strategic significance and whether the impacts will ripple beyond the district; whether or not they are mentioned in community strategies; whether the projects are sufficiently advanced to expect them to be developed in the plan period, I think all four would pass that test and could on that basis be specifically mentioned.

THE CHAIRMAN: Mr Pealing?

RURAL REGENERATION CUMBRIA: I mentioned South Lakeland Gateway. I don't know what people feel about that or whether that should be included or not.

THE CHAIRMAN: Reference was made to that project last Friday and I have read the document on that. You are saying it has tourism elements but what I have read is that it is much broader than that. If you are happy you can take it that we have seen that document and we will consider that in the context of the discussion from last Friday.

Before we break I will tell you where we are going after lunch which is policy EM16 and the definition of tourism projects which will be welcomed under that policy. So after lunch we will look at whether that is too restricting and whether there should be mention of recreation, sport, shopping. I know people who come to the Lake District just to go shopping. There are wider tourist experiences that people have in the Lake District other than those which are stated and I fully appreciate they need to be there, they are important and they come from the relevant circulars and Acts. So we will discuss whether or not a wider range of tourist experiences should be mentioned in the National Park policy in particular. We will meet again at two o'clock.

(Lunch 1.10 - 2.00 pm)

THE CHAIRMAN: I want to return to the question I raised just before lunch, which was to do with policy EM16, which is the policy dealing with tourism in the Lake District National Park. In a sense the basis on which tourism projects can come forward, the frame of reference in a sense that tourism facilities should be based on visitors' enjoyment and understanding of the National Park's distinctive environmental, cultural and historic character.

The question I raised was is this a bit too narrow, and should there be a slightly wider frame of reference to bring other tourist related activities such as shopping, sport, recreation, etc? This point, I think, was raised by the Cumbria Tourist Board, so maybe I could ask Mr Greenwood to kick us off.

CUMBRIA TOURIST BOARD: We believe that the wording of policy EM16 is too tightly drawn as it stands at the moment. Just to add a simple and hopefully constructive suggestion which is that the words "should not prejudice" replace "be based on" in the wording of the policy. That way I don't think we are undermining the spirit of the policy in any way but actually accommodating the occasional

development proposal which will be broadening tourism appeal, adding quality and diversity to what exists for the tourist and visitor to do, without necessarily drawing things too tightly. I am not suggesting that that would necessarily be a shopping development, but it could be something to do with and/or recreational sport, for example, which in my mind would not always necessarily fit comfortably in with the current terminology in the policy.

THE CHAIRMAN: Thank you. It might be worth, at this point, referring to the Joint Authorities' further statement on page 6, on this topic, which actually does introduce suggested further change to the policy, which actually is not terribly far away from what you are describing. Page 6. I think this amendment will go towards the end of the policy before the three points 1,2,3. The paragraph immediately before 1,2,3 would read: "Tourist development would only be permitted where statutory purposes of National Parks are not contravened and where". That is similar to what you are suggesting, but obviously it is introduced a little bit later in the process.

CUMBRIA TOURIST BOARD: Two quick responses to that. I think the first is that the statutory purpose of the National Park are introduced right at the beginning of the plan, and I think are written fairly large in the plan, and I am not convinced it needs reiterating in this bit of the policy. But I think not only could we introduce words such as "should not prejudice" but it would be far better if it was written positively, and the word "tourism development will be permitted where". It goes on to say: "And does not prejudice".

THE CHAIRMAN: Thank you. I see what you are driving at. At the end of the day though you still have a description of tourist activities which does not include the things I mentioned earlier; retailing, sport, recreation etc. Are you content just to change the introduction? My impression was that you were after something a bit more encompassing from your written statements.

CUMBRIA TOURIST BOARD: I think there is obviously a rationale and an important link with National Parks' objectives and its distinctive environmental, cultural and historic character. I think those are things any tourism development should certainly be sympathetic towards. So I think the mention of those remains very appropriate within the policy, but it is the necessity to be based on those three distinctive facets which causes the problems to the Board.

THE CHAIRMAN: So you are happier if in a sense the policy is maybe a little bit more flexible, but you don't see the necessity to mention other forms of tourism experience.

CUMBRIA TOURIST BOARD: I don't believe that is necessary.

BARDEN PLANNING CONSULTANTS: My point was going to be very similar. I have got exactly the same words marked in my amendment to the policy. In respect to this recently proposed change, I actually think that that is intended to be a further tightening rather than a relaxation. I think that is the intention. It follows the observations made by FLD, that to stick up the two statutory purposes of National Parks almost in front of the criteria, and I think it is for those reasons I would not wish to see that change being put in, because those purposes of the National Parks are set

out in the document as a whole, and are we going to suggest that really they should be put in front of every policy that deals with development in National Parks, because they are just as applicable to other development as they are to this?

I think there is a wider point that you keep having the purpose of National Parks pushed at you, but there is the wider responsibility of the Lake District National Park Authority as the local Planning Authority, and it does not escape those duties. It has the duties in all the other areas that are covered by the Town and Country Planning Act. So while it is specifically charged with promoting facilities for the enjoyment of the special qualities, that does not mean that it is not, as a local planning authority, responsible for ensuring that other tourist type proposals are catered for if they are appropriate, and provided they do not prejudice the two aims, then they should be catered for. For those reasons I wanted the words "not prejudiced" rather than "based upon" because it is extremely difficult for the applicant -- I always come back to the applicant because ultimately that is the test I end up with -- it is difficult for him to say, suppose it is a hotelier who wants to upgrade his hotel by providing four extra en suite rooms; how does he claim that that is based upon visitors' enjoyment of the area? He cannot do that. He has got no way of demonstrating that. He can demonstrate that it won't prejudice those aims, provided what he is doing fits in, in terms of landscape character and design and so on. That can be repeated throughout a whole host of potential applicants for potential developments, which are not of themselves targeted at bringing someone here for a particular purpose. People come to Lake District hotels quite often because they are good hotels, and you come away for short breaks, which are increasingly popular. The quality of the hotel is perhaps, as much as anything, what attracts them to that particular premises. If it wants to upgrade, additional rooms or whatever, it may not be able to demonstrate that that is based on people's enjoyment of the area.

FLD: I think the question you posed before lunchtime is that basic question for looking at the comments that have just been made. Is EM16 too restrictive? I think it is better to just cast our minds back to what has happened to the existing plan and existing local plans. I think that is a relevant consideration. If you remember also that the previous structure plan had the last sentence on the original proposal for EM13 deleted, and it is now no longer in EM16. During that time we are aware certainly of some significant investment in the tourism industry; in hotels, attractions and within a major caravan site over the period of that structure plan, and the first five or six schemes I can come to probably total something in the order of investment of 5 or 6 million. I understand the previous chief planning officer of the National Park Authority to say that since the Windermere by-law decision was announced, he was aware of 10 to 12 million pounds worth of investment round the Windermere basin in new tourism projects.

I think there is perhaps a misperception that the existing policy was too restrictive and that therefore the current policy, which does not have that phrasing which is less restrictive, is operating against evidence which suggests that the tourist industry has been encouraged and allowed to diversify, to adopt and adapt itself to the changing markets and the changing situations. That is the first point I would make.

Richard Greenwood and Brian Barden and the Authorities have suggested modification to wording in this policy. I was a participant in the industrial panel of

planning enquiry, and the words of Inspector Metcalf always ring in my ears from his concluded comments. If I might be permitted to quote a sentence from that: "The plan, quite rightly in my view, discriminates against over exploitation and commercialisation of the area merely as a holiday resort and seeks to encourage the enjoyment of those natural qualities which are so special to the Lake District whilst ensuring their long-term protection."

I think that had the measure of the dilemma we have here today. How much development is acceptable to help people enjoy the area, and when do we get to that line of over exploitation, over commercialisation which would be unacceptable? I just wonder. I mean, I can see a case for strengthening the wording and leaving the wording as it is. I am just worried that further perceived weakening of the policy will become too slack rather than too restrictive.

THE CHAIRMAN: I will turn to the two authorities in a moment and just ask whether the specific suggestion that has been put to us would in fact be a weakening of the policy or not. But before that, could I bring Windermere Lake Cruises.

WINDERMERE LAKE CRUISES: It may not have escaped the notice of many people here that a great many visitors to the Lake District these days are ethnic minority visitors. Although it may not be specific to this, it is something that needs to be taken into account. The key words for our visitors from Manchester, Blackburn and Darwin and all these other places, the Lake District and the National Park is safe and it is welcoming. It is a perception that somehow needs to be woven into the structure plan, I think.

Just going on from that, I have to say I did travel with Visit Britain to India earlier this year, and discovered that the Lake District is the third most popular destination for incoming tourists from South Asia, and that reflects into this policy here with the points of cultural interest. They come here, many of them, for the peace, the tranquillity, the beauty, the water, and also for the connections with Wordsworth. India's national poet was very, very keen on Wordsworth. Wordsworth is taught in the Indian state school system, and also with Ruskin. Ghandi was very much influenced by Ruskin. When the Constitution was being developed in 1947 in India, Mahatma Ghandi spent many, many weeks speaking about Ruskin's thoughts and his teachings.

So we are going to have a lot more ethnic minority people here. Until recently most people who came here from the sub continent came and stayed with friends and relatives because the Indian government would not allow currency to come out of the country. That has now changed. We find that people want to come here. They want to come under their own steam. They need good public transport links. They come in seek of our history. But more than anything else they come because they perceive it as being safe.

A huge proportion now, an ever increasing proportion of our custom is the British Asian community. They come here not just to travel on a boat. They come here and bring money into our communities, which supports sustainability, and they do like their shopping. I was quite taken by the mention of shopping. It may have led me into this. Ambleside, where I live, has become, along with Keswick, the anorak

capital of England. And we do get so many people who come here. The diverse nature of the customers often amazes me. I don't think we have to lose site of that. We can get very, very serious sometimes about structure plan policies. In all my years as clerk to the Lakes Parish Council I sometimes got fed up with such things. I am very heartened to hear what people have said today, but I think we need to bear those two words in mind: "Safe and welcoming".

THE CHAIRMAN: Could you just confirm that you are essentially saying you are happy with the balances in the policy at the present time, is that correct?

WINDERMERE LAKE CRUISES: Pretty well, yes.

DAVID BROCKBANK: This is really a question more than a point of clarification, as to whether the future development, as it is mentioned in the policy, means also redevelopment. If there are existing tourism developments that need to upgrade that may not be exactly environmental, cultural or historic character of the National Park, does that mean they would not be able to be upgraded? That is really my question.

THE CHAIRMAN: I am sure the joint authorities will pick that up in that moment. Any of the district councils? Are you happy with the wording as it stands? Any comments on the alternative modifications that have been offered by the tourist board and Mr Barden?

ALLERDALE BC: We would defer to the National Park Authority in this instance, sir, if it is clear we are talking about the National Park.

AUTHORITIES: Just to pick up on a few points that have been made here, obviously the first paragraph that talks about enjoyment and understanding is linked with the National Park purposes and the promotion opportunities for the understanding and enjoyment of the special qualities of the parks by the public.

Just before we finished for lunch there was some discussion about the type of development or redevelopment etc. that had taken place, just to demonstrate those links with the environmental, cultural and historic character of the Park.

We actually looked at the range of opportunities and range of developments that have taken place, including things like reuse of historic buildings, conservation area improvements, attractions in terms of things like the theatre by the lake, which provides a very beneficial, not only visitor but also facility for the local community, and has got very close cultural links with the area through our artistic, theatrical performances.

There is also a lot of work gone on in terms of integrated access. Just a minor point; there was some reference to ethnic minority groups. This is one particular aspect of work that we are involved in. There is a project called Open Return, which is looking at integrated access, and particularly at the accessibility of the National Park to minority groups of all kinds.

Again I think it has been brought to stress here that the development plan and management plan for the National Park are two complimentary documents, and

obviously a lot of the work that goes on in terms of recreation and informal activities is very much management based.

In terms of the wording, the suggested amendment to EM16 which is made on page 6, again there has been some debate as to whether this is rather negative in tone. We have suggested that there is some direct link to statutory purposes, particularly because in the opening paragraphs of the Joint Authorities' statement, on page 3, paragraph 1.4, the final bullet points I think is very important, there is this very close link and dependence between tourism and the special qualities of the National Park, and when we reconsidered the statements and looked again at this particular policy, EM16, thought the National Park purposes -- although they are stated at the beginning of the planning in paragraph 1.8 -- did need to be reiterated there.

I would, however, say that within the suggestion for EM16 we are saying statutory purposes and National Parks are not contravened. It will be possible there and I think probably preferably to say "supported and enhanced".

THE CHAIRMAN: Take out the words "are not contravened". So it would read "tourist development will only be permitted where the statutory purposes of the National Parks are supported and enhanced." So that is putting more of a positive light on the text.

MR GIBBS: Is that the basis for putting it in, Mrs Houghton. Is that in order to make the text presentationally more positive?

AUTHORITIES: Those words, yes. And also it brings it in line with conservation designations. I think it is just a more consistent wording, and it does put the emphasis on the positive aspect.

THE CHAIRMAN: I don't think you commented on the suggested wording put forward by the Tourist Board, or did I miss that? In the beginning of the policy, in the second line, taking out "should be based on" and putting in "should not prejudice". Could you comment on that, please?

AUTHORITIES: Yes, I think we would be happy to make that amendment.

THE CHAIRMAN: Mr Barden, I think you want to come back?

BARDEN PLANNING CONSULTANTS: Yes, two points. The first was Mr Brodie's statistics he quoted or waved around about investment in tourism. Simply to say, of course there is always the opposite side of the story and all those things that have been rejected and not been able to proceed. But in terms of this latest suggestion of changing, it seems to me that is very detrimental in the sense it is requiring proposals to enhance the character of the National Park, and I think the words used were "protect and enhance" rather than the words from the duties which are "conserve and enhance". Of course you will be fully familiar with the court cases about conserve and what it means, which is to include safeguard from harm. So if it is not harmful it is okay. If you put "protect and enhance"—

FLD: It was "support and enhance".

BARDEN PLANNING CONSULTANTS: Support and enhance, then you do not have a situation where you have only got a neutral stance. You have got to actually show positive effect. You have either got to be supporting or you have got to be enhancing. So, as I suggested earlier, it is definitely strengthening and making it even tighter and to use your words, more grudging.

THE CHAIRMAN: I was quoting somebody else.

BARDEN PLANNING CONSULTANTS: I think that summarises it really.

THE CHAIRMAN: I haven't any further questions on that point.

DAVID BROCKBANK: Just to repeat my question as to whether it applies to redevelopment of sites as well, because that could be restricted on current uses of brownfield tourist sites that are not perhaps supporting or enhancing.

THE CHAIRMAN: Yes, could the joint authorities just provide us with guidance on that?

MR GIBBS: I think it might be helpful to particularly refer to the impact of the raising of the quality bit there because it is "sustaining these attributes and adding quality". Are we in a position where if one of Mr Brockbank's refurbishment/redevelopment schemes, the upgrading of a caravan site, for example, could be seen as a quality improvement. I imagine, that is how it might come within the terms of this policy, is that right?

AUTHORITIES: Yes. We have no issue with improving the quality of existing sites, providing obviously the improvements do fall within the local planning framework. I would just like at this point, if I may, to refer to page 6 of our statement, paragraph 2.6. The final line on that page, which talks about "significant potential for development". I would just like to clarify here that again, in terms of development, we are talking really about quality improvements and redevelopment of sites, given that, as we have already heard in the earlier discussion on land, employment land provision, EM12, that there is obviously very little land for new development.

CUMBRIA TOURIST BOARD: Briefly I just want to clarify, that I think the wording "to support and enhance National Park statutory purposes" becomes an even tougher test than the original phraseology and potentially gets us into the same sort of difficulties we find with conservation area proposals. So I very much reiterate the request really that we look back to the original proposal "should not prejudice National Park purposes or the distinctive environmental, cultural and historic character".

THE CHAIRMAN: We have heard those points and we will discuss those points between ourselves. I don't think I need to bring in anybody else. So can we move on then. The two questions A and B really are very similar in some ways. The points run straight through. The question B is: "Does the approach to tourism development outside the National Park allow sufficient scope for the tourism industry and the wider economy to be diversified and strengthened."

I think we have covered quite a bit of this already. The particular items I had underneath this were firstly to talk about the seaside towns. This has been raised by Allerdale. I think you would like some reference to the seaside towns in the context of tourism within the plan.

ALLERDALE: Yes, I don't want to add much to that. Certainly the coastal resorts are specifically flagged up in RPG, and would like that carried through into the structure plan. Now the Joint Authorities have responded by saying that in LDDs etc. we can designate such as local service centres, but I think the RPG is actually flagging them up as a specific issue, and I think we would like to see the same in the structure plan as well; for the structure plan to give a little bit more in principle support to tourism in those particular seaside resorts, and I think I speak for Copeland as well on this issue.

THE CHAIRMAN: Just remind us which towns you are talking about?

ALLERDALE: Silloth on Solway is one. There is a small resort, Allonby, north of Maryport. Maryport itself is perhaps not one to cite, but in Copeland there is Seascale, Haverigg, St. Bees. These are small scale.

MR GIBBS: But they are distinct from the areas that are the regeneration of West Cumbria areas. Is that right or is it an aspect of it?

ALLERDALE BC: They are all within the West Cumbria/Furness regeneration area as per the structure plan. They are distinct coastal resorts in themselves, some with particular characteristics, like Silloth, which is a nice Victorian grid pattern cobbled streets and such like. We would like the structure plan to particularly flag up those.

THE CHAIRMAN: Can I check whether you are asking for a policy or just some mention in the text, and would you want them all specifically mentioned by name or just the principle?

ALLERDALE: I think the principle would do and not necessarily a separate policy. In the text maybe some of them might be named but you end up again with the problem of a list. It has to be exhaustive. If you name one, then you have got to name them all.

THE CHAIRMAN: This is just mainly to draw attention to the regeneration needs and also the tourist potential -- maybe both?

ALLERDALE: Yes, that's right, in the policy I think rather than the text.

AUTHORITIES: If I could come in there, which might be of assistance to you in terms of a specific reference. If you were to look at Policy ST9, which is the strategic policy, which caters for Furness and West Cumbria, that does give it a specific reference to meet the needs of Allerdale and Copeland, towards the end of the policy, on page 20 of the structure plan proposed changes, where it says: "The provision of new tourism attractions will be encouraged especially where this builds on the heritage of coastal towns". To me that does give a lot of specific encouragement to the kinds of development that Allerdale and Copeland have referred to.

THE CHAIRMAN: Do you think some reference in the tourism section specifically would be helpful, just to kind of draw more attention to that?

AUTHORITIES: The tourism policies as written would not preclude the development in those towns. If it helps amplify the regeneration initiatives and other programmes, then that is certainly something which could be incorporated in the supporting text perhaps.

THE CHAIRMAN: I think it is here just as a further example of a distinction between the regulatory function and the not quite waving a flag, but making it clear the positive side as well, but maybe there is not too much to say about the regulatory aspects, but maybe there is a story that could be put in to emphasise the importance of the towns and their regeneration needs and their value in tourism terms that might be helpful.

ALLERDALE: Yes. I think we would wish a separate reference to it. I appreciate and, yes, I know that we are in ST9, but we would support a specific reference in the tourism section.

THE CHAIRMAN: Anybody else?

CUMBRIA TOURIST BOARD: In addition to the West Cumbria coastal resorts, there is a gem of a place called Grange-over-Sands, which had its heyday in Victorian times but is still a popular coastal resort. It is one of a number of resorts in the northwest which was the subject of a regeneration study about two years ago, on northwest coastal resorts, and is in need of some major refurbishment and redevelopment of its promenade and the old pool, and again some mention, some hook, within the structure plan would be helpful. It would reinforce its role along with the ones that Richard was mentioning as tourist resorts rather than just being a part of the plan, and I think would have a positive regeneration role for the structure plan as well.

THE CHAIRMAN: Elizabeth Jackson.

SLDC: South Lakeland Council support what Mr Greenwood said, and we have had a problem since the first level plan was adopted in 1997 with loss of use of guest houses and hotels to other uses, and the alteration to our local plan actually has a new policy which seeks to prevent that loss of tourist accommodation use, so we would support anything in the plan which identifies Grange and its need to be regenerated as a tourism town.

THE CHAIRMAN: I intend to do my bit for Grange-over-Sands this weekend, I am going to spend the weekend there and sample what is on offer for the tourists. Anybody else want to come in on this point? If we could move on then to the second point I had listed on my agenda, tourism recreation. This is a point raised by Copeland. The question was should there be a more explicit link between the ripple effect out of the Park to tourist facilities in areas requiring regeneration? We did cover this to a certain extent last week in talking about the regeneration issues in West Cumbria and Furness and how they could be affected by its relationship to the Park.

Again, it's a bit like the topic we have just covered, the seaside towns, is this something that needs a mention here in the tourism section as well as in other places?
Mr Evans.

ALLERDALE BC: Yes. I would say the answer is yes, because we did make the same basic point about we would like some mention of the opportunity of West Cumbria and other areas outside the National Park to sort of tap into the potential that there is within the National Park, and it could be justified as a corollary even with the quieter issues in the west in particular.

MR GIBBS: Could I just pick up; to an extent that is said at the bottom of paragraph 3.22 in the sentence 'the strategy stresses that tourism development can aid the regeneration of West Cumbria and Furness and assist rural diversification'. I think that is a reference back to the regional economic strategy and it may be that you want to endorse that approach, and I was wondering is there a distinction here to be drawn between West Cumbria and Furness and the area of Eden and South Lakeland, in that we are specifically talking about West Cumbria and Furness and the effect to the west of the National Park rather than the area to the east of the National Park. Is that correct?

ALLERDALE BC: I took it to make that distinction, certainly that particular reference to regeneration in West Cumbria and Furness; it's an issue, a separate issue.

MR GIBBS: And you would like to build on that reference I think is what you are saying?

ALLERDALE BC: I think so, yes. I think just a little bit more focused, yes.

THE CHAIRMAN: Elizabeth Jackson.

SLDC: We would support what Mr Evans has just said in respect of Furness.

THE CHAIRMAN: And I was just thinking back to this morning's discussion where we were talking about the Derwent Forest and the Barrow shipyard regeneration that maybe exemplify some of the things that we are talking about. Mr Pealing.

RURAL REGENERATION CUMBRIA: I think probably just to try and clarify the difference between the areas outside National Park in terms of their tourism development, and it would be helpful if Richard Greenwood might help me out with this to make sure I am correct, because I think the essential difference is that all of those areas are where we would want to encourage additional tourism development but maybe in different ways for different reasons. For Furness and for West Cumbria linked to regeneration, and in particular urban regeneration; I could point out for example that more than £35 million has been spent in the last 10 years on Whitehaven harbour and the surrounding area, and major developments have taken place, including a new 200 berth marina, the Beacon Discovery Centre, the Rum Story, and it has taken that much money to actually have the effect that it's now starting to be seen as a tourist destination in its own right. It is a long term high infrastructure cost, and in a sense Barrow has to recognise that, that one or two cruise ships might start to change the tenor of people's view of the town, but it's a long term major

infrastructure development. In terms of the works going on in East and North Cumbria, it is clearly a different scale. You are not looking for major infrastructure investments in East and North Cumbria, but what you are trying to do is develop its tourist potential in terms of what it has to offer, not in terms of bringing huge numbers of people into those areas, except maybe along Hadrian's Wall itself, but in terms of trying to encourage small scale tourism activity to key service centres that are mentioned in SD5 like Kirkby Stephen, Alston, Brampton in the long term, and Rural Regeneration Cumbria is working with the district councils and other agencies to try and bring some small scale tourism developments into these areas. Kirkby Stephen for example is a good example where it's on the main tourist route through from the North East, it's got a market place where many buses which are going either into the Lake District or down to Lancashire stop, and yet there is not really, other than cafes, much for them to do, and we have been looking at trying to help promote the town for greater tourism activity. So it's that type of thing. I think it's an issue about scale and appropriateness. And of course the environment of the valley in North Cumbria is one that we want to protect, but there are opportunities there that we could grasp, not to put huge numbers of people in but just to help to increase the visibility of tourism in Eden and Carlisle.

MR GIBBS: I have just got a question to link into this area. We have got the Yorkshire Dales National Park Authority here. I am just wondering whether, in the context of your National Park Authority, there are issues that we ought to be conscious of in terms of development around your National Park and not yet in it?

YORKSHIRE DALES NPA: Well, perhaps the main one, although I don't know a great deal about it because it's very early days yet, is Sedbergh. In Sedbergh there is an initiative there that is just beginning to look at the regeneration of the town there, and perhaps to try and drag some visitors and some visitor spending in from South Lakeland, or the rest of South Lakeland, on the back of a sort of book town initiative. So I have sort of sat here quietly because we have in Sedbergh a town that is probably in need of some regeneration, in need of some new direction, that happens to be within a National Park, so it's perhaps a different situation than is found in some of the larger villages, settlements, however you are going to define them, within the Lake District. It is interesting to hear what has been said about Kirkby Stephen, which does of course also lie along the coast to coast route as well, which passes through Cumbria and then enters into North Yorkshire just after Kirkby Stephen, and there are opportunities there perhaps.

THE CHAIRMAN: Mr Evans.

ALLERDALE BC: Sir, I have got a new issue. I don't know if you wish to conclude the regeneration question first.

THE CHAIRMAN: Could you tell me what the issue is and I can see where it might fit?

ALLERDALE BC: It's the relative policy on AONBs and National Parks.

THE CHAIRMAN: Yes. Mr Hopcraft.

EDEN DC: I think we would recognise the role in tourism providing a higher way economy in Eden, and areas such as Eden. I think the days when tourism was regarded as providing low wage seasonal work have long since gone. So we welcome that, and I think the sort of initiative that Mr Pealing was talking about with Kirkby Stephen and the added visitor attractions and the like, it is also appropriate to mention the work of the North Pennines Area Partnership, where we have a management plan in conjunction with other authorities, including Carlisle, where we are seeking to sustain tourism, provide sustainable tourism.

THE CHAIRMAN: I think in terms of just bringing this back into the plan, I think the kind of things you have been describing in Eden and North Cumbria are, as far as I can see, consistent and compatible with the framework provided by the plan, is that correct?

EDEN DC: Yes. We don't have any comment, certainly no adverse comment to make on the structure plan.

THE CHAIRMAN: So if I can just round off this discussion on the question of regeneration, and I go back to the two authorities and perhaps put it to you that although there is some reference to the connection between regeneration and tourism elsewhere in the plan, some more further mention perhaps in the text here might be helpful. Could you take that on board do you think?

AUTHORITIES: Yes, Chair. If you are actually referring to policy EA15, of course there is an explicit reference to the link between tourism and regeneration in the second paragraph of that particular policy, which gives a lead in for the regeneration needs in both key service centres and the local centres, and I think that is really a point that I would stress, that the structure plan sees those centres as doing the job in essence in terms of being the key locations for the further establishment of tourism, the realignment of tourism, strengthening tourism. Again, it's back to the key strategy of the plan which aims to focus that in centres with community and regeneration needs. And also some care to be taken in terms of the proliferation and possible spread of developments wider afield and the effects that that will have on sustainable travelling communities. We do in the structure plan of course draw out the potential for tourism in the strategy section. It is mentioned in policy ST7 as Carlisle actually fulfilling a tourist role. There is a number of references to regeneration and tourism in ST9, and in the supporting policy for North Cumbria, paragraph 2.25, links made there between Hadrian's Wall and the potential that that has for developing that area for tourism in a quality way. So we try to do it actually in the spatial areas as opposed to the references coming in the generic policy for tourism. So we do feel to sum up that we have taken on board that regeneration and link between economic development and tourism.

MR GIBBS: Just one point. Can I pick up on the matter raised by Mr Martakies, which rather linked in with the point I was making earlier this morning about Japanese visitors? Is there an importance in putting a linkage probably in the supporting text with international position of the Lake District, and I tie that in particular with its position as a candidate World Heritage Site, where, as I understand it, greater emphasis is now being placed on the Lake District for its cultural significance as well as on its landscape significance on the basis that in relation to an international designation what needs to be brought out is its world significance, which

is not that of a National Park in the American sense of unspoilt natural area, but a living and lived in and lived through landscape? Is there a way that there ought to be some sort of cross-reference in this policy through to the World Heritage Site and international significance? Maybe it occurs.

AUTHORITIES: I am not sure that we need additional reference to the international importance. I am thinking in terms of the obvious attraction of a whole range of different visitors. I mean, obviously the international visitor market is very significant and is growing, and at the moment it represents about 5% of the visitors to the National Park. In terms of World Heritage Site, again I think discussions are still in progress, there is a lot of work going on at the moment within the partnership, and I am just not sure that we need to make additional reference to that, but I could...

MR GIBBS: Mull it over?

AUTHORITIES: Yes.

THE CHAIRMAN: I will come back to Mr Evans later, maybe I can take your point right at the end, because I think in a way something that Mr Fairlamb mentioned about the key service centres took me on to – I am sorry, Mr Martakies.

WINDERMERE LAKE CRUISES LTD: Just one brief point. I think it's fair to say that if you go away and you speak to people from overseas, the point they make is that they do not come to visit Cumbria, they come to visit the Lake District. I think it's a point that is often lost, whether it be political reasons or whatever, and I know that there is a great need for regeneration on the periphery, and I know there is a great deal of social funding and other funding has been made available around the west coast in Barrow and so on that has not been made available in the Lake District, and so a great many operators, tourism people in the Lake District had to dip into their own pocket to fund what they do, but it is nonetheless a fact that people do recognise the Lake District but they do not necessarily recognise Cumbria.

THE CHAIRMAN: Going back to my agenda, on the third point I had the role of key towns and service centres. Now, we did discuss this at considerable length last week and we don't want to reopen that discussion. On the other hand, I am aware that there are maybe just one or two people here who weren't here for that discussion, and without wanting to reopen it, I wouldn't want to deny an opportunity just to make a point in relation to tourism and the key service centres, and the key point really, going back to policy ST5, there is a list of key service centres which doesn't include the towns in the National Park – Keswick, Ambleside, Bowness and Windermere – so without reopening it, and I shall be strict on this, I would be prepared to give Mr Greenwood an opportunity just to make any points that he would want to make which we could carry into our consideration of that topic, and anybody who wasn't specifically at the meeting last week. Mr Greenwood.

CUMBRIA TOURIST BOARD: Thank you for that opportunity. In simple terms the Board believes that the towns of Windermere, Bowness, Ambleside and Keswick should have been defined in policy ST5 as areas for potential growth, and our justification for that line of argument is that they fit the criteria in terms of their size, their scale, their service provision, and in reality are the areas which are likely to be the subject of most pressure for and investment in tourism development in years to

come, whether it's the upgrading of hotels to meet quality standards, whether it is to meet the aspirations of visitors in terms of new attractions, whether it is to compensate for loss of business around Lake Windermere on the back of the 10 miles an hour speed limit, and also to make the most of the opportunity that has arisen as a result of the Market Town Initiative for Windermere, Bowness and Ambleside. The Board, together with its partners, has produced a master plan for raising environmental quality in Windermere and Bowness, and it wants that to be an exemplar scheme which will take 20 years to realise, but it wants that to act as an exemplar scheme for other towns, particularly within the Lake District National Park, because that is where we believe the public realm is in most need of being lifted. So we think the whole environment and the investment climate for the Lake District to regenerate and to be successful the Lake District Renaissance Project will be improved if Windermere, Bowness, Ambleside and Keswick are specifically mentioned as growth settlements in ST5.

THE CHAIRMAN: Mr Pealing, I think you actually took part in the discussion last week.

RURAL REGENERATION CUMBRIA: I did, but I just wanted to make an additional point really.

THE CHAIRMAN: I think the problem then is that there might be other people who also want to make additional points. I can say we did have a very full discussion. I think the problem with opening it up at all is that we kind of do it all again, which we don't want to do, but I did want to bring the Tourist Board because they had specific points to make and they weren't here previously. You were here previously. I think Mr Brockbank wasn't, but I think you were invited and you weren't able to attend.

MR GIBBS: We have had very strong messages on the subject.

THE CHAIRMAN: We have. I think I am reluctant to invite you to speak.

RURAL REGENERATION CUMBRIA: Well, it's obviously your decision, but it is an important point actually that we were going to make.

DAVID BROCKBANK: It's just a question as to whether we could include other key service centres in the National Park; there are other towns...

MR GIBBS: That was looked at as well.

THE CHAIRMAN: We did discuss it.

MR GIBBS: It's a question of key centres, and we looked at a range of centres.

THE CHAIRMAN: We did discuss it, and you were represented when we dealt with that. So I think we will stop it at this point. The question of quiet areas and seasons. This has been raised by South Lakeland, as to whether the emphasis in policy EM16 on quiet areas, quiet periods of time, would actually tend to limit the tourist season, is that correct?

SLDC: Yes. Just to provide clarity, we are really concerned with quiet times and the effect of maintaining that stance, how it would affect the seasonal work. We are

trying to encourage higher wages and more full-time work for tourism related employment, and that was the point we were trying to put forward in our submission.

MR GIBBS: Is that against the background of evidence for an extending season?

SLDC: That is right, sir, just the general trends in tourism generally, or the extension of the tourism period throughout the year, and we felt that it wouldn't help if the work was seasonal and we had quieter times in the policy.

THE CHAIRMAN: I wonder if this is more a point in relation to the Park's lop rather than the structure plan. Are you referring to point 1 at the end of the policy EM16, which talks about 'development being permitted only if it didn't conflict with special qualities or diminish opportunities for quiet enjoyment'; is that the heading that you are addressing?

SLDC: That is right, sir, and also the reference on page 32 of the proposed changes on paragraph 3.26 where it refers to the quieter periods.

THE CHAIRMAN: Just take me to the further changes again.

MR GIBBS: No, it is not the further changes, it's part of the original text, 3.26. In essence though, is what you are looking for a reference to the fact that the season is extending for a longer period than it used to do; would such a reference help meet your point?

SLDC: That would help, yes sir.

THE CHAIRMAN: Mr Greenwood.

CUMBRIA TOURIST BOARD: The reference in policy 3.26 and the policy as well continues to cause Cumbria Tourist Board some difficulties simply because we are trying to create all year round employment and to extend the season to encourage obviously more visitors outside the peak periods. It seems eminently good sense to try and sustain tourism and visitors arriving in the county right through, with the possible exception of a six week period that has been suggested over the Christmas/January break when caravan sites typically will close, and there are perhaps other good reasons for that as well. There is almost some concession to that in the joint authorities statement where they say in 8 instances where they have had applications for extending the season of caravan sites, 7 have been allowed, so it begs the question why on earth do we need this written into the structure plan or the policy at all? It doesn't seem to serve any purpose in the modern day tourism environment.

THE CHAIRMAN: Mr Barden.

BARDEN PLANNING CONSULTANTS: As I understand it, sir, it is not actually in the policy, it is only this one reference in one paragraph, and as far as I am aware it can only relate to caravan parks and caravan and camp parks who have not got any other control, and the one point I would make is that caravan parks are, if you like, discriminated against as they are the only ones who this control is exercised on, and 7 out of 8 were approved. The one that wasn't, there were good nature conservation reasons why not. It has actually perhaps been more generously determined than it's written; it does give the National Park Authority a fairly wide remit in the local plan

to refuse if it wants to. It does rely on them being fairly generous I think at the moment, and maybe we should be looking in that local plan to actually get that sorted out as and when it arises, and maybe it just needs to lose the word out of the paragraph here about quieter season, because in practise the National Park Authority can't influence the season other than on caravan parks; everywhere else there is no control, and it itself actually runs special events at Rockall in the Christmas winter period because it's good business.

THE CHAIRMAN: Mr Brodie.

FLD: Mr Barden has partly covered the point I wanted to make, that the only planning issue is caravan sites and camping sites, but I think the Lake District issue and the Cumbria issue for these types of site is that they largely rely on native tree screening in order to protect the landscape from the busyness, the lights, the activity on those sites, and the growing season for native trees is about six months, so there is a different issue when you come to the caravan sites.

THE CHAIRMAN: Mr Martakies.

WINDERMERE LAKE CRUISES LTD: I think the one important thing we don't have to do through the structure plan is to put out a negative message to people coming here that in fact we do have a quiet period, because we all admit that winter, which is what we are talking about, is a quieter period than the summer, but to promote sustainability and to maintain services for local people as well as visitors, we do need all round tourism, and again, as Mr Greenwood said, we need to promote employment prospects here, and certainly for the company I represent we are now able to employ a much larger workforce all year round now that we operate throughout the year than we were when our operational season was from Easter to October. So I fear that this reference in 3.26 actually is detrimental to tourism.

MR GIBBS: Just as an example of extending the season, could you help a little bit with at what stages you moved to the year round operation, and was it a growing intensity of weekends and then weekdays, or what has been the pattern?

WINDERMERE LAKE CRUISES LTD: When I began with the company in the late 1908s the only winter activity was the occasional boat up to Brockhole, or some poetry reading or whatever, or to Rydal Mount, mince pies and poetry and candlelight; now we operate scheduled services around the lake every day except December 25th, and we have found that people have come to expect that that service is provided. And by taking people around the lake and by pursuing our policies to make people leave their cars behind in car parks and to use the boats as a means of public transport to take them from A to B, we feel that we are doing something positive here for tourism in the National Park, because we are bringing people here, attracting them, who come year after year after year now knowing that we will be there and other attractions will be open, spending their money, which means that butchers can take a few extra pence on a weekend when someone is staying in a holiday cottage and so on and so forth. People such as Langdale Co-op can do well out of tourists. We do need this winter trade but it mustn't be taken out of perspective. It is still quiet in the winter.

THE CHAIRMAN: Does anybody else want to speak on this subject? Okay, nobody else. Helen Houghton, the question comes down to 3.26 rather than the policy as to whether this is helpful. It comes out of the social and economic well being of the park and people who live and work there. Is this a helpful statement or not?

AUTHORITIES: To go back to one of your original comments, it is very much a local plan matter and it does relate specifically to caravan sites. There is a particular issue as FLD have just mentioned and landscape impact through tree screening. Generally it is obviously a relative term and everyone would acknowledge that the winter period is quieter. In terms of the policies, a lot of winter opening is very much determined by the market and by demand of the visitors and the policy as it stands doesn't preclude the majority of tourism provision, facilities, attractions, et cetera, being available and being open over the winter period.

MR GIBBS: Reading the paragraphs it seems to (a) ignore what we are being told about the season spreading at the shoulders and (b) if it is spreading at the shoulders it seems to have an implication that this will have adverse consequences, not that it may have adverse consequences. That may be a question of impression rather than intent of your text.

AUTHORITIES: It may be impression rather than intent and again if I could refer to the quieter areas which is mentioned, without getting into detailed discussion on that, it is a relative term and I did note in the agenda there was reference to "quiet" areas. Again it isn't intended to imply any sort of blanket approach. There is an acknowledgement there. In a sense the reference to quieter periods provides that link to the local plan.

THE CHAIRMAN: Is that the main purpose of this paragraph? One way of looking at it is to deal with this in the local plan which you obviously have done but you are saying it is helpful to have this as a connection?

AUTHORITIES: Yes, sir.

THE CHAIRMAN: You could argue it sends different kinds of messages to some people. This could be an attractive message that there are quiet seasons. That might attract people to go to those places in those times. On the other hand, it could be a negative message. Perhaps we should leave that one here and we will ponder on it in the peace and quiet of our hotel. Does anybody else want to speak on this one? No. Mr Evans for your additional point?

ALLERDALE BC: I have a question which, although it doesn't fit nicely within your four questions that you specified, it does fall within the overall question about the approach to tourism development within and outside the National Park and it is a question of the way that the Structure Plan deals with nationally designated areas and particularly the National Park and the AONB. I am not at all clear whether the Structure Plan in its reference to statutory purposes of both the National Park and the AONBs is really making any distinction in policy terms. I think I would like some clarification on that. To me, the statutory purposes of each --- they are quite similar but you can read the statutory purposes of the AONBs as being less supportive of development than the statutory purposes of the National Park. I would like that

clarification and whether the joint authorities would read it that way or not or whether they see that there would generally be a similar policy applying to each and if so maybe we should put the AONBs into EM16.

MR GIBBS: Before the County Council reply, I see the distinction between EM15 and EM16 being as much as anything the fact that the Lake District National Park is where the high level tourist activity is taking place and the other areas are areas where there is much lower level tourist activity taking place. The fact that one happens to be the Lake District National Park and the other is the surrounding area has historical linkages but it is why there are two policies for the two areas. I am beginning to look at these two policies and in the light of the earlier debate about changing the first sentence of EM16 they were converging in structure very considerably but there was still a point about EM16 in that it was looking at areas of higher pressure for tourism where tourism is well established whereas EM15 was looking at areas where tourism is not very established. That is how I was looking at it. Is that the position of the National Park authority and the County Council?

AUTHORITIES: That is a point to bear in mind. It is what is the commonality between AONBs and national parks and when you look at the designation in legislation the commonality in terms of status is in terms of its landscape quality. Also to refer to the fact that it is only in the renewable energy policy and the landscape policies that we actually class the two together. Because of the differences in terms of the socio-economic conditions present, we have made separate provision for AONBs for other aspects of development. It is not always that the two are brought together. Particularly we are talking here of tourism, it is important to retain the separation because if you look at the separate purposes of paragraph 1.8 for the National Parks and 1.9 for AONBs clearly the National Park purposes stray into the areas of having reference to tourism and that affecting developments particularly in regard to the educational value of the areas.

THE CHAIRMAN: So there are different statutory purposes. Was your point that there was a difference in statutory purposes or a different level of support for tourism development in the statutory purposes or was it the way in which it was expressed or was coming out in the plan, Mr Evans?

ALLERDALE BC: It is a bit of both, sir. I see a slight distinction between the statutory purposes of each and I would like some steer from the joint authorities to avoid the endless discussion that there will be about what the hell do these statutory purposes really mean in terms of a particular planning proposal. I would like some further steer on that issue. I accept the distinction between the policies as Mr Gibbs has described, the busy areas and the ones for everywhere else, but it leaves a slight grey area in terms of the AONBs. It leaves it a bit too open. I would like more of a steer in terms of the AONBs in policy terms specifically for tourism and maybe the landscape issue is in the policy, et cetera, but specifically for tourism and the effect that policy would have.

THE CHAIRMAN: What you are saying is that in EM16 the purposes are spelt out. They are there. Whereas in the case of the AONBs they are mentioned in EM15 and that their purposes should not be contravened or diminished but the purposes are not spelt out. That is essentially what you are driving at.

ALLERDALE BC: That's right, sir, but also I have trouble with the statutory purposes of the AONB. I am not sure what it really means. I would like some further clarification in terms of the actual impact on the policy that that has. Are they basically the same in terms of statutory purposes as National Parks or are they not and what are the implications of that?

THE CHAIRMAN: Can Mr Brodie help us on that?

FLD: I want to support Mr Evans in asking for further thoughts about whether AONBs should come under EM16. I do so wearing a hat as a member of the Solway Coast AONB joint advisory committee, and as a member of some working groups for the North Pennine AONB and also living within two miles of the Ironside and Silverdale AONB. I am reminded that the former chief planning officer of the old Cumberland County Council made strong representations to the Countryside Commission, bearing in mind the Solway coast was not the Hobhouse identified area, that he was so sick to death about tourism development on the Solway coast that he would like an AONB in the area so the tourism pressure argument does apply to the Solway coast.

MR GIBBS: Is this Silloth tourism pressure or was it other?

FLD: It was Allonby, Silloth and other places around there, Beckfoot, et cetera. The Ironside/Silverdale AONB has had to address the significant issues of tourism pressures within that area as well. So the point Mr Gibbs made is well taken in considering whether the AONBs should be within EM16 but as far Richard Evans' point is concerned, all I can offer is PPS7 paragraph 21 where the Government is saying that National Parks, AONBs have been confirmed by the Government as having the highest status of protection relating to landscape and scenic beauty. The other point to notice is that whilst both National Parks have the protection, enhancement, natural beauty, et cetera, for statutory purposes the AONBs do not have the second statutory purposes of National Parks and we must remember that in this consideration.

THE CHAIRMAN: Before I ask Mr Fairlamb, does Mr Bamber want to come in?

GONW: I don't know whether I can say much but Mr Brodie raises an interesting contradiction because one is used to thinking of the AONBs as being lesser (if that's the right word) to the National Park because the National Park has those statutory purposes and now Mr Brodie is pointing out that the AONB has the first purpose which is landscape protection but not the second which is promote opportunities for understanding enjoyment which implies that the AONB regime should be seen as more restrictive than the National Park. I don't think that is the intention really. The AONBs are mentioned in policy EM15 which seems to me to be a fairly clear reference but you may take a different view. One wouldn't want to elevate the AONBs protective status by the backdoor so to speak. Mention of Allonby and Silloth was interesting because you have one view that there is too much tourist development in Allonby and Silloth and other people have been saying they would like more tourist development in that area.

MR GIBBS: The earlier reference is to a slightly earlier period of time, isn't it?

THE CHAIRMAN: I think so.

ALLERDALE BC: It was the issue of caravans that was crucial to the AONB designation in the 1960s. It remains with us but we would wish to see other sectors ...

THE CHAIRMAN: Mr Fairlamb, are you going to round this one off? Or shall we take Mr Barden first?

BARDEN PLANNING CONSULTANTS: I think there is a slight confusion here between duties of the National Parks and purposes. There has been suggestion that there are two purposes to the National Parks. In fact it is the duties that are two-fold. The purposes were wider than is set out there. They weren't just to protect the landscape. They were to do with the opportunities they afforded for outdoor recreation and their proximity to urban areas and so on. There is no duty as such on AONBs because there is no Act that says you have this duty as the National Park authority because there isn't one for the AONB. It is just the local planning authority. So the reason for designation was their landscape value and there is a duty to protect that landscape value but there is still the other duties as a planning authority to carry on and determine planning applications having regard to the landscape impact that they will have and the fact that it is an AONB. There is no duty to promote anything nor is there any suggestion that they are there for outdoor recreation.

THE CHAIRMAN: Yes. Mr Hopcraft?

EDEN DISTRICT COUNCIL: Just a simple point. The purpose of AONBs are set out in the Countryside and Rights of Way Act as I'm sure you appreciate.

THE CHAIRMAN: Yes, Mr Fairlamb?

AUTHORITIES: I have to admit that the two authorities have taken this issue rather simply in terms of how they have expressed it in policy. Clearly there is a need to distinguish the National Park in terms of its tourism policies given its particular special purposes. The special purposes of the National Park are made fully explicit at paragraph 1.8 and as for the AONBs they are again made explicit at paragraph 1.9 but there is a need outside the National Park to protect the statutory purposes designation in the AONBs and that's why the cross reference is in policy EM15, that those special purposes shall not be contravened. There is a further change to contravened. So that is really why it is there. The debate seems to be ending on the fact of what are the statutory purposes of both designations and whether that is right or wrong but unfortunately we have to live with the designations and it is only right that the Structure Plan policy makes reference to the statutory purposes of AONBs in that they shouldn't be contravened. That is why it is there in the policy.

THE CHAIRMAN: Mr Evans?

ALLERDALE BC: My final point is that I appreciate what Iain says entirely but it is not going to help us in terms of when we come down to the nitty gritty of what those statutory purposes in the AONBS boils down to when we are considering a

planning application and whether there is anything more to it than landscape, if you take my point.

MR GIBBS: Just to clarify, would you prefer the AONB to be removed? Or you would like to have reference to the AONB but you are not quite sure the value of this particular reference? Is that it?

ALLERDALE BC: Yes, I would like the particular steer in the policy on the AONB a little bit more focused than the statutory purposes.

MR GIBBS: You don't want us to recommend taking out a reference to the AONBs?

ALLERDALE BC: No.

THE CHAIRMAN: Are there any other points that anyone wants to raise on this topic? No, in which case we will draw today's session to a conclusion. Tomorrow for many of you we will be here again on caring for the environment.

(Session ended at 3.30 pm)

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