

Tourist Accommodation Retention Supplementary Planning Document

STATEMENT OF CONSULTATION

September 2016

1.0 Introduction

- 1.1 This consultation statement has been prepared in accordance with Regulation 12(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It supports the Tourist Accommodation Retention Supplementary Planning Document (SPD), which has been published for public consultation.
- 1.2 In preparing a Supplementary Planning Document (SPD), local authorities are required to publish a Statement of Consultation setting out:
- Who was consulted during the preparation of the draft SPD;
 - How they were consulted;
 - The main issues raised in response to the consultation;
 - How those issues were addressed in the draft SPD.
- 1.3 The Tourist Accommodation Retention Supplementary Planning Document (SPD) will update the policy position in relation to tourist accommodation as a result of changes in visitor behaviour and attitudes in recent years. The new policy position will help the tourist accommodation stock remain fit for purpose and meet the requirements of current and future visitors.
- 1.4 The Tourist Accommodation Retention SPD will not create new policy; it will provide a new interpretation on existing planning policy within the Local Plan.
- 1.5 The draft SPD has been published for consultation commencing on 23rd September until 4th November 2016.

2.0 Who was consulted?

- 2.1 The Tourist Accommodation Retention SPD has been informed by consultation responses on a Seafront Local Plan Issues and Options Report, and through meetings and discussions with the Eastbourne Hospitality Association.

- 2.2 Eastbourne Borough Council maintains a mailing list of all bodies, organisations and individuals that have previously asked to be kept informed about the preparation of planning policy documents. All stakeholders on the mailing list are notified by email or letter of any planning policy consultation being undertaken.
- 2.3 A 14-week consultation on the Seafront Local Plan Issues and Options Report was undertaken, which was open to any stakeholders who wanted to express an opinion on the future of the Seafront, between 17 July and 23 October 2015.
- 2.4 All consultees on the mailing list were informed of the consultation, and properties within the Seafront Local Plan boundary received a letter and a brochure. In addition, and all residents on Eastbourne Borough Council's customer record were also notified; approximately 8,000 people in total. All hoteliers and tourist accommodation providers registered with Eastbourne Borough Council were informed, including the Eastbourne Hospitality Association.
- 2.5 In addition, the Eastbourne Hospitality Association, represented by the Chairman and the Vice-President, have been involved in discussions and the development of the SPD

3.0 How were they consulted?

- 3.1 In July 2015, a Seafront Local Plan Issues and Options Report was published. An Issues and Options Report is a consultation document that sets out an initial view of what main issues relating to the future of the Seafront are, and a range of different options for how these issues can be addressed. It is the first formal consultation stage in developing the Seafront Local Plan, and the local community and other stakeholders were asked to provide their input into whether the right issues have been identified and which options they would prefer to take forward.
- 3.2 The Issues and Options Report was developed following a review of evidence relating to the Seafront, which included a Tourist Accommodation Study that was produced by consultants in 2015, and a survey of Seafront users that took place in the summer of 2014. The preparation of the Issues and Options Report also took into account the views of the stakeholders who attended a Stakeholder Event on the future vision for the Seafront. This was held on 10 February 2015 in the Winter Gardens, and was attended by 60 individuals, representing either themselves or organisations with an interest in the Seafront.
- 3.3 The Seafront Local Plan Issues and Options Report was initially published for consultation with the community and other stakeholder between 17 July and

9 October, following authority from Cabinet on 8 July 2015. The consultation period was subsequently extended for an additional two weeks and the consultation period officially concluded on Friday 23 October 2015.

- 3.4 Consultation on the Seafront Local Plan Issues and Options Report was undertaken in accordance with the adopted Statement of Community Involvement. The local community and other stakeholders were contacted directly via:
- Letters or emails sent to the 150 stakeholders on the mailing list (including statutory consultees).
 - Letters sent to approximately 2,000 properties and businesses within the defined Seafront Local Plan boundary.
 - Emails sent out to all tourist accommodation providers in the town.
 - Emails sent to around 8,000 people on the Eastbourne Borough Council customer record.
- 3.5 As part of the consultation, a 12 page Summary Leaflet was produced. This summarised the background to the consultation, the issues that were considered to need addressing in relation to the Seafront, and the options for how the issues could be addressed. These Summary Leaflets were made available at the Seafront Office, the Tourist Information Centre and the Customer Contact Centre at 1 Grove Road. The Summary leaflets were also delivered directly to tourist accommodation providers who agreed to distribute them to visitors, and to approximately 2,000 properties within the defined Seafront Local Plan boundary.
- 3.6 The Eastbourne Herald published articles relating to the Seafront Local Plan on 7 July and 17 July, and posters advertising the consultation were displayed at Tourist Information Centre, theatres, notice boards along the promenade, major supermarkets, railway station, 1 Grove Road, Town Hall, Fisherman's Green, Libraries, the Arndale Shopping Centre and Langney Shopping Centre.
- 3.7 An exhibition was displayed at the 'Airbourne' event between 13 and 16 August 2015, where an officer was available to talk to people about the consultation and answer questions. Summary leaflets were also distributed at this event.
- 3.8 In addition, meetings were held with the Eastbourne Hospitality Association on the 8 September 2015, the Driving Devonshire Forward group on the 21 September, and the Eastbourne Disability Involvement Group on the 21 October 2015.
- 3.9 Consultees were given the option to respond to the consultation by:
- Commenting on the Issues and Options Report directly on-line via the consultation portal;

- Completing the on-line questionnaire, or by uploading an electronic version to the consultation portal;
- Returning a paper copy of the questionnaire via email or post;
- Providing comments directly to the Regeneration & Planning Policy team via email or letter.

3.10 Following the Seafront Local Plan consultation, and once a decision had been taken not to continue with the process of preparing the Local Plan and to prepare a Tourist Accommodation Retention SPD instead, a number of meetings were held with the Chairman and Vice-President of the Eastbourne Hospitality Association. These meetings included senior officers of the Council, and took place on 10 March 2016, 10 June 2016 and 3 August 2016.

3.11 Frequent meetings also took place between key officers and councillors on the Local Plan Steering Group.

4.0 Summary of the Main Issues and how they were addressed

4.1 During the consultation on the Seafront Issues and Options, a total of 257 comments were received. The Seafront Local Plan Issues and Options Report contained a section of Tourist Accommodation, and specifically on the issue of tourist accommodation retention. A total of 39 comments were received on the tourist accommodation retention issue.

4.2 The Seafront Local Plan consulted asked 'Which approach to the retention of tourist accommodation do you think is most appropriate?' The report presented four potential options:

- Option 1 – Continue existing policy position
- Option 2 – Remove Tourist Accommodation Area designation
- Option 3 – Reduce Tourist Accommodation Area designation
- Option 4 – Designate Primary and Secondary Tourist Accommodation Areas

4.3 The greater proportion of the participants (44.7%) thought that designating Primary and Secondary Tourist Accommodation Areas would be the most appropriate approach to the retention of tourist accommodation. However a large number of representations (36.2%) suggested continuing the existing policy position. A much smaller proportion of participants felt that to remove (6.4%) or reduce (12.8%) the Tourist Accommodation Area designation would be the most appropriate approach.

4.4 However it was noted that, as the planning concept of a Tourist Accommodation Area is a technical one that can have implications on the amount, quality and location of visitor accommodation in Eastbourne, some of

the responses to this question may not have come from an informed position. The Eastbourne Hospitality Association, who represents the hoteliers in Eastbourne, supported a reduction in the Tourist Accommodation Area.

- 4.5 It is felt by some participants that if accommodation is of a high standard then more people would stay and this would increase the viability and value of properties. Some of the participants feel that the quality of the tourist accommodation needs to be improved and to retain those which are currently good quality (hotels, guest houses, holiday lets and bed and breakfast accommodation). There are some suggestions of altering the TAA, to not include Wilmington Gardens and the few properties on South Cliff.
- 4.6 A table summarising the responses received on the Tourist Accommodation retention question is provided in Appendix 1.
- 4.7 It was intended that these Tourist Accommodation policies would be reviewed as part of the Seafront Local Plan. However, following consultation on a Seafront Local Plan Issues & Options Report, it became apparent that there is no appetite for large scale change or development on the seafront, and as a result the Seafront Local Plan is not being progressed.
- 4.8 The formulation of new planning policy can only take place through a Local Plan. As the next Local Plan is not due to be adopted until 2020, it is not possible to create a new policy for Tourist Accommodation at this time. However, in order to update the policy position on Tourist Accommodation, it was decided that a Supplementary Planning Document should be produced to provide an updated interpretation of the existing policy.
- 4.9 The fact that it is not possible to change the policy through the SPD limits what the SPD can do. However, taking into account the fact that the majority of respondents to the tourist accommodation question favoured a separation between primary and secondary areas within the Tourist Accommodation Area, it was considered that this principle could be brought forward into the SPD.
- 4.10 Many of the other comments received relate to the provision of new tourist accommodation, which is outside of the scope of this SPD.

5.0 Statutory consultation

- 5.1 Eastbourne Borough Council's Cabinet approved the draft Tourist Accommodation Retention SPD for the purposes of public consultation on 14 September 2016. It was presented to the Council's Planning Committee for its consideration on Tuesday 30 August 2016.

- 5.2 The SPD has been published for a period of consultation prior to its adoption in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 5.3 The consultation takes place over a 6-week consultation commencing on Friday 23 September until Friday 4 November 2016. The SPD documents comprise the following documents:
- Draft Tourist Accommodation Retention SPD
 - Statement of Consultation
 - Guidance Notes for Making a Representation
 - Statement of Representations Procedure
 - Response Form
- 5.4 Letters have been sent to all specific and general consultation bodies. All other organisations, residents and businesses that are on the Local Plan Mailing List have also been informed.
- 5.5 All representations received by the end of the consultation period and the issues raised will be taken into account when finalising the SPD. Following approval from Cabinet, it is anticipated that the SPD will be fully adopted by Full Council in February 2017.

Appendix 1 – Summary of Representations received on Seafront Local Plan

Which approach to the retention of tourist accommodation do you think is most appropriate?

Rep ID	Respondent	Summary of Representation
SQ/4	Paul Humphreys	Tourist accommodation, particularly camping, located just outside the Borough boundary should be considered
SQ/5	Janice Vango	Cycling holidays would attract good custom.
SQ/10	Einar Solgaard	Option 4 should give the tourist industry opportunity to adapt to changes.
SQ/14	Andy Beirne	The town needs tourist accommodation to survive
SQ/16	Jenny Wood	The quality of tourist accommodation needs to be improved
SQ/39	Suzie West	
SQ/40	Pippa Wagstaff	
SQ/109	Chris Neighbour	
SQ/22	Ann Jones	Removing the designation could lead to conversions into flats.
SQ/38	Nigel Power	Do whatever it takes to bring in quality tourism.
SQ/40	Pippa Wagstaff	Luxury facilities with spas should be encouraged
SQ/42	A Barnes	Increasing the numbers of tourists will blight the lives of residents
SQ/45	Ian Haddock	Encourage diversification of tourist areas.
SQ/52	Marina delgaudio	No comment/preference
SQ/100	Cynthia Cain	

Rep ID	Respondent	Summary of Representation
SQ/103	Sussex Wildlife Trust (Jess Price)	
SQ/120	Fiona Cain	
SQ/60	Patricia Palmer	More tourist accommodation is required at the Harbour and Sovereign Centre.
SQ/80	Yvee Elbro	It is better to reduce the less cared for establishments to maintain an overall quality and safety raising the profile of holidaying in Eastbourne.
SQ/90	Barry Kadwill	This has worked well I cannot see how the other options would bring any benefit.
SQ/96	Howard Simpson	Introduce criteria for change of use in secondary areas.
SQ/99	breakers guest house (mark Holland)	The existing TAA does not work. If the TAA is removed some of the sea front hotels could become high quality residential accommodation, leaving the rest to upgrade. It should be left to the market, but using criteria based policies and other planning policies to develop the town's accommodation offer.
SQ/104	South Downs National Park Authority (Anna Ludford)	The National Park Authority would support an appropriate retention policy which is sufficiently flexible to maintain and support a broad range of visitor accommodation in Eastbourne. This will support the visitor economy in the National Park and wider area.
SQ/107	Robert Lawson	Unclear about what "criteria-based" policies means.
SQ/109	Chris Neighbour	Option 4 gives the opportunity to plan better for the future with a flexible approach.
SQ/113	Eastbourne Town Team (Penny Shearer)	If visitor accommodation was of a high standard more people would stay and then the property would be more viable. Once more viable it becomes more valuable. The marketing of Eastbourne plays a key part in keeping values up. Also individual owners and investors also need to invest in their own businesses. Education and support for owners would help to professionalise the industry. All business owners need to be more knowledgeable of their industry and planning cannot be relied upon to support any one sector.

Rep ID	Respondent	Summary of Representation
SQ/113	Eastbourne Town Team (Penny Shearer)	Option 1 - There is a risk that the property may not be un-needed but may not even be attractive enough to be bought – so will become derelict.
SQ/113	Eastbourne Town Team (Penny Shearer)	Option 2 - This may happen anyway – but don't give it away at the start.
SQ/113	Eastbourne Town Team (Penny Shearer)	Option 3 - But would this improve the market? The risk is that the new edges would be at risk through under investment and questionable viability once again.
SQ/113	Eastbourne Town Team (Penny Shearer)	Option 4 - We had this before and it caused a great deal of anguish for the council when change of use applications were received. It may well mean that all secondary space is lost.
SQ/117	Kath Boak	Buildings should be used for some other tourist use, not housing.
SQ/118	Eastbourne Hospitality Association (Darren Weir)	The drawing of lines of a Tourist Accommodation Area is not as important as the Supplementary Planning Guidance that necessarily has to go with it.
SQ/118	Eastbourne Hospitality Association (Darren Weir)	If there were a robust, yet flexible Supplementary guidance document, the removal of the Tourist Accommodation Area could work by the establishment of "Grandfather rights" to those accommodation providers outside of the current TAA. This would allow the market.
SQ/118	Eastbourne Hospitality Association (Darren Weir)	The EHA would support having the Tourist Accommodation Area being cut off at Cambridge Road and Wilmington Gardens not be included. We would also suggest keeping the Hydro Hotel in the Tourist Accommodation Area at the West but not include the few properties on South Cliff.
SQ/118	Eastbourne Hospitality Association (Darren Weir)	The EHA sees the merit of retaining properties that have a sea view as these should be regarded as premium, however, properties off the Seafront have less merit for retention in the medium to long term and do find it difficult to compete.

Rep ID	Respondent	Summary of Representation
SQ/118	Eastbourne Hospitality Association (Darren Weir)	The policy of reducing the Tourist Accommodation Area will take some time to have an effect in reducing the amount of tourist accommodation available and it is likely to be a very gradual process of properties applying to convert.
SQ/118	Eastbourne Hospitality Association (Darren Weir)	The reduction should be more targeted at the larger hotel 2 Star market in the side streets off the Seafront who do struggle and particularly with the reduction of independent coaching holiday companies.
SQ/118	Eastbourne Hospitality Association (Darren Weir)	<p>The SPG needs to be much more flexible and should address the following issues:</p> <ul style="list-style-type: none"> • Make it clear that it applies to the new TAA • The Council should have a better understanding of the market conditions and a more flexible and trusting approach. • It must be phrased in a way so the tests are able to identify those applicants who are trying profiteer and those who are genuinely desperate and cannot get out. • Remove the requirement to look at other tourist uses • 3 years for marketing a property is wholly excessive – it should be 12 months • Life style businesses must be treated more leniently and differently • Cut down on the amount of information requested. Ask the industry what would normally be expected in the commercial world. • Perhaps look at the strict value only – get rid of the rest • The SPG needs to be flexible enough to reflect the existing market reality • EHA should be granted "expert status" and needs to be granted more respect in the process. • Shift elements of the burden of proof from the applicant onto the Local Authority.
SC/129	Driving Devonshire Forward (DDF)	Retain good quality hotels, guest House, holiday lets and Bed & Breakfast accommodation with different pricing levels