

Tourist Accommodation Retention Supplementary Planning Document

STATEMENT OF CONSULTATION

February 2017

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.

2.0 Who was consulted?

- 2.1 The Tourist Accommodation Retention SPD has been informed by public consultation responses on a Seafront Local Plan Issues and Options Report and on a Draft SPD, 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 A 6-week consultation on the Draft SPD was undertaken between 23 September and 4 November 2016. All consultees on the mailing list were informed of the consultation, and hoteliers and tourist accommodation providers were informed through the Eastbourne Hospitality Association.
- 2.6 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?

Seafront Local Plan Issues and Options

- 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 2015, 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.

Draft SPD

- 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 meeting 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.
- 3.12 The Draft SPD was published for consultation with the community and other stakeholder between 23 September and 4 November 2016, following authority from Cabinet on 14 September 2016.
- 3.13 Consultation on the Draft SPD 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 300 stakeholders on the mailing list (including statutory consultees).
 - Emails sent out to all tourist accommodation providers in the town.
- 3.14 In addition, the Eastbourne Hospitality Association, who had been heavily involved in the drafting of the SPD, took responsibility for promoting the consultation amongst local hoteliers and tourist accommodation providers.
- 3.15 Consultees were given the option to respond to the consultation by:
- Commenting on the Draft SPD directly on-line via the consultation portal;
 - Completing the on-line representation form, or by uploading an electronic version to the consultation portal;
 - Returning a paper copy of the representation form via email or post;

- Providing comments directly to the Regeneration & Planning Policy team via email or letter.

4.0 Summary of the Main Issues and how they were addressed

Seafront Local Plan Issues and Options

- 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.

Draft SPD

- 4.11 Consultation on the Draft SPD resulted in 17 representations from 10 different consultees. A table summarising the representations received is provided as Appendix 2.
- 4.12 Four representations received commented that there should be further definition of what sort of uses tourist accommodation could change to, and in instances where conversion to residential is proposed, this should be in the form of single units rather than flats. In response, within the tourist accommodation area, existing policy only allows uses that are compatible with tourist accommodation uses. The compatibility of any proposed use with tourist accommodation uses would be assessed through the planning application process. It is not possible to insist that tourist accommodation that changes use to residential only does so in the form of single family dwellings or large flats. However, the Government have published nationally described space standards for new dwellings, and new residential units should comply with these standards.

- 4.13 One representation questioned the definition for a lifestyle business, and suggested that a more appropriate threshold would be 8 letting bedrooms. However, the Eastbourne Hospitality Association are aware of a number of establishments of more than 8 rooms who do not take on staff. In addition, it is the experience of the Eastbourne Hospitality Association that smaller businesses of less than 15 rooms are unlikely to have business plans for the purposes of the assessment criteria. In addition, a threshold of 15 rooms is used in other situations, such as by the TV licencing authority who require a different type of licences for establishments over 15 rooms. Therefore it is considered that a threshold of 15 rooms is appropriate for the purposes of this SPD.
- 4.14 One representation questioned the SPD position in relation to 'winter lettings'. However, it is not considered appropriate for the SPD to encourage "winter lettings" of tourist accommodation where it would function as permanent accommodation. The use of an establishment as permanent accommodation, even if just in the winter, would constitute a HMO, which is not permissible by policy.
- 4.15 One representation related to the extent of the Tourist Accommodation Area designation, and particularly that it should be extended towards Sovereign Harbour. The Tourist Accommodation Area is defined by existing policy. The SPD provides a detail to assist in the interpretation of an existing policy and is not able to amend existing policy.
- 4.16 In addition, the significance of the Business / Conferencing Sector was raised as not being adequately addressed in the SPD, and that the provision of new tourist accommodation at Sovereign Harbour will support both tourist and business based visitors. In response, additional context and background relating to the business / conferencing sector was added to the SPD. However, the SPD does not deal with the provision of new accommodation and therefore this issues is outside of the scope of the SPD.
- 4.17 The changes to the SPD arising as a result of the consultation on the draft SPD is provided in Appendix 3.

5.0 Conclusion

- 5.1 This Statement of Consultation and Representations sets out who was consulted and how on the Tourist Accommodation Retention SPD and what was said and how this influenced the production of the SPD.
- 5.2 Consultation on the Tourist Accommodation Retention SPD took place in two parts. Issues surrounding retention of tourist accommodation were included in a consultation on the Seafront Local Plan Issues and Options Report between 17 July and 23 October 2015. The Seafront Local Plan was

subsequently no longer progressed, although the comments relating to retention of tourist accommodation informed the drafting of the Tourist Accommodation Retention SPD.

- 5.3 A Draft SPD was published for public consultation between 23 September and 4 November 2016. This resulted in 17 representations from 10 respondents. Some minor amendments were made to the SPD as a result of these comments, although it is not considered that any of the representations raised any major issues.

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	
SQ/103	Sussex Wildlife Trust (Jess Price)	

Rep ID	Respondent	Summary of Representation
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.
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.

Rep ID	Respondent	Summary of Representation
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.
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	The reduction should be more targeted at the larger hotel 2 Star market in the side

Rep ID	Respondent	Summary of Representation
	(Darren Weir)	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

Appendix 2 – Summary of Representations received on the Draft SPD

Rep ID	Name	Section	Representation	Officer Response
TAR_SPD/ 01	A Bythesea	Introduction	Why does the tourist area not extend to the harbour? There was planning permission for a hotel by the Martello tower the far side of water treatment works. This would provide another tourist area with great beaches and allow a recreational bar/cafe for residents in that area.	<p>The SPD provides a detail to assist in the interpretation of an existing policy. The SPD is not able to amend existing policy. The Tourist Accommodation Area is part of existing policy, and therefore cannot be amended by this SPD to extend as far as Sovereign Harbour.</p> <p>The Tourist Accommodation Area as defined by existing policy represents the area where it would be most expected to find tourist accommodation. It is considered that the area around Treasure Island is the eastern extent of the area in which visitors would expect to find accommodation.</p> <p>Although the site at Sovereign Harbour close to the Water Treatment Works was identified for a tourism use in the past, this site is now subject to an extant planning permission for residential development, and therefore is no longer available for a hotel.</p>
TAR_SPD/ 02	Mike Reid (Reid+Dean)	Assessment of Viability	I consider the threshold of 15 bedrooms (better defined as 15 letting bedrooms) is too high. I think the determining factor on whether the business is "lifestyle" is whether staff need to be employed to run it. The	The SPD recognises that a 'lifestyle business' is a blend of home and business, set up with the aim of achieving a certain level of income.

Rep ID	Name	Section	Representation	Officer Response
			majority of businesses with up to 8 letting bedrooms are run by a husband and wife team and are truly "lifestyle". Any more letting bedrooms than this then staff will normally need to be employed.	<p>It is appreciated that definition would suggest that the business does not employ staff to help run it, and consideration has been given to amending the threshold to 8 rooms.</p> <p>However, the EHA are aware of a number of establishments of more than 8 rooms who do not take on staff. In addition, it is the experience of the EHA that smaller businesses of less than 15 rooms are unlikely to have business plans for the purposes of the assessment criteria. In addition, a threshold of 15 rooms is used in other situations, such as by the TV licencing authority who require a different type of licences for establishments over 15 rooms. Therefore it is considered that a threshold of 15 rooms is appropriate for the purposes of this SPD.</p>
TAR_SPD/03	Mike Reid (Reid+Dean)	Assessment of Viability – Proposals within the Primary Sector of the Tourist Accommodation Area – para 5.12	The phrasing of Criteria B is wrong. Change "save" to "promote"	<p>Applications submitted for change of use in the Primary sector will be on the basis that the applicant believes that the tourist accommodation is unviable and cannot be saved. If the tourist accommodation can be saved, it would not satisfy the criteria in the SPD as a whole.</p> <p>Therefore it is considered the "save" is the</p>

Rep ID	Name	Section	Representation	Officer Response
				correct word in this context.
TAR_SPD/04	Mike Reid (Reid+Dean)	Assessment of Viability – Proposals within the Primary Sector of the Tourist Accommodation Area – para 5.20	At 5.20 it should be noted that for many years banks will not lend on a closed business (on its own account). They will usually only be interested in funding after three years of trading.	<p>The unwillingness of banks to lend on a closed business is noted.</p> <p>However, for the purposes of the SPD, if a tourist accommodation establishment with no trading history provided the information required and had been turned down for a bank loan, this would demonstrate a clear intention to get the establishment up and running, but it has not been possible.</p> <p>Therefore it is considered that there is no reason to amend para 5.20.</p>
TAR_SPD/05	Mike Reid (Reid+Dean)	Assessment of Viability – Proposals within the Secondary Sector of the Tourist Accommodation Area	Taken overall there is no reference to the Council's attitude to "winter lettings". Each establishment will have its own season and for many smaller ones they will effectively be closed for more than half the year. The policy should have regard to, and maybe encourage the use of winter lettings even if that does not include any meals being provided. It should at least give the opportunity for this kind of letting without incurring enforcement.	<p>It is not considered appropriate for the SPD to encourage "winter lettings" of tourist accommodation where it would function as permanent accommodation.</p> <p>The main conference season in Eastbourne is in the 'shoulder' months and it is considered that there is sufficient demand for a well-run business to run all year round. In addition, as a blend of home and income, a 'Lifestyle business' should be able to open and close accordingly.</p> <p>The use of an establishment as permanent accommodation, even if just in the winter, would constitute a HMO, which is not</p>

Rep ID	Name	Section	Representation	Officer Response
				permissible by policy.
TAR_SPD/06	Kath Boak	Assessment of Viability – Proposals within the Primary Sector of the Tourist Accommodation Area	This policy does a lot to update the current policies in line with modern tourism. I think it is good.	Noted.
TAR_SPD/07	Stuart Bannerman	Tourist Accommodation Area	Whilst the objective is sound, some idea is needed about what other uses will be acceptable in the secondary area. A more comprehensive plan is essential to prevent uncertainty and/or confusion leading to a planning vacuum - which in turn (and in time) could undermine the primary area. Obviously not HMOs, so what else can be ruled out and what might be ruled in?	<p>Other uses that are compatible with tourist accommodation uses would be considered acceptable, in accordance with existing policy. The compatibility of any proposed use with tourist accommodation uses would be assessed through the planning application process.</p> <p>Conversion to HMO is specifically ruled out as it is considered that it would be incompatible with the tourist accommodation use. There may be other uses that would also be incompatible. It is not possible to identify exactly what uses would be appropriate – this would be determined at the planning application stage.</p>
TAR_SPD/	Craig Booth	Tourist	I agree that it is essential that redundant	It is not possible to insist that tourist

Rep ID	Name	Section	Representation	Officer Response
08		Accommodation Area	tourist accommodation is not allowed to be turned in to HMO's, or bed-sit style accommodation. Is there a method by which the planning authority could insist that buildings were kept as single family dwellings, or larger flats? I think such usage would encourage better maintenance, which will be crucial to maintain the welcoming appearance of the tourist accommodation areas.	accommodation that changes use to residential only does so in the form of single family dwellings or large flats. However, the Government have published nationally described space standards for new dwellings, and new residential units should comply with these standards.
TAR_SPD/09	Einar Solgaard	Assessment of Viability – Proposals within the Primary Sector of the Tourist Accommodation Area	Additional criteria: Demonstrate that it has been attempted without success to merge the tourist accommodation with neighbouring TAs to create a more robust business.	It is not considered reasonable to require that tourist accommodation establishments merge with neighbouring establishments. In addition, the Tourist Accommodation Study recognises that the establishments with between 10 and 50 rooms are too large for a lifestyle business, but too small to operate efficiently as a mainstream commercial hotel. Requiring tourist accommodation to consider merging could recreate more establishments between 10 and 50 rooms, and therefore would not necessarily create a more robust business.
TAR_SPD/10	Einar Solgaard	Assessment of Viability – Proposals within the Secondary Sector of the Tourist	Additional criteria: Demonstrate that it has been attempted without success to merge the tourist accommodation with neighbouring TAs to create a more robust business.	See response to TAR_SPD/09.

Rep ID	Name	Section	Representation	Officer Response
		Accommodation Area		
TAR_SPD/11	Roger Clark	Background & Context – Background – para 2.7	<p>Since 1984 we have been a holiday accommodation provider on Eastbourne's seafront & adjacent to it also. We have noticed over the past decade or so there has been a decline in visitors wanting accommodation with us. Thankfully we have many repeat bookings, because we provide what is expected/ needed. Our visitors love Eastbourne & the surrounding areas, & use their own transport to explore.</p> <p>Unfortunately the decline began years ago when the big coach companies came to Eastbourne offering in their hotels "cut price all-in holidays" (for a few days-- not a week), which included ease of travel, in house entertainment, trips out etc. This is still on going. Of course it is mainly visitor age related, but has had a knock on effect for us, re our age related guests, as it has for the rest of smaller accommodation establishments.</p> <p>Thankfully we do have families, younger people too, who stay.</p>	<p>The Tourist Accommodation Study recognises that there is a need to upgrade the supply of tourist accommodation in order to meet future market needs and attract a wider range of people. However, due to Eastbourne being a highly seasonal destination this does not necessarily mean expanding the number of available rooms, but rather focusing on diversifying the product and enhancing the overall quality. The Tourist Accommodation Retention SPD aims to do this by allowing additional flexibility for tourist accommodation establishments in secondary locations to exit the market and reduce some of the oversupply. The advantage of this is that this will help change the structure of the tourist accommodation stock in order to appeal to a wider range of visitors and respond to market trends.</p> <p>Eastbourne Borough Council is also undertaking a rebranding exercise that will help with aspirations for changing the perception of the destination and attracting more families and younger people to visit.</p>

Rep ID	Name	Section	Representation	Officer Response
TAR_SPD/12	Roger Clark	Tourist Accommodation Area – para 4.6 / 4.7	Regarding the “gradual reduction of stock” in the Primary & Secondary areas (Eastbourne's eastern seafront) tourist accommodation buildings should be returned wholly to residential use, with the proviso that a building is not divided into separate flats, or made into an HMO, or let for student accommodation.	It is not possible to insist that tourist accommodation that changes use to residential only does so in the form of a single dwelling and not in the form of flats. However, the current policy does resist changes of use within the Tourist Accommodation Area to uses that are considered to be incompatible with tourist accommodation use. Borough Plan Policy HO14 specifically states that HMOs will not be permitted in the tourist accommodation area.
TAR_SPD/13	Roger Clark	Tourist Accommodation Area – para 4.9	“Gradual reduction of stock” should be returned to wholly residential use, not divided into separate flats, or given to student accommodation, or HMO's	See response to TAR_SPD/12.
TAR_SPD/14	Natural England	General	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Noted.
TAR_SPD/15	Highways England	General	We have reviewed the consultation document and do not wish to make any comments.	Noted.
TAR_SPD/16	Marie Nagy (Teal)	Background and Context	It is appreciated that the SPD deals specifically with the retention of tourist	The Tourist Accommodation Retention SPD aims to update the interpretation of existing

Rep ID	Name	Section	Representation	Officer Response
	Planning on behalf of Sovereign Harbour Limited)		<p>accommodation and how proposals for the loss of accommodation within the proposed primary and secondary tourist accommodation areas will be assessed. The document's Background and Context Sections however has two significant omissions. These should be addressed if future trends in the visitor accommodation sector are to be fully understood and future planning applications appropriately appraised.</p> <p>The significance of the Business / Conferencing Sector, as a demand group for accommodation is not recognised. Trends in this sector (and within the local economy overall) are important for Eastbourne and for its accommodation providers across the town, including outside of the proposed primary and secondary areas set out in the SPD.</p>	<p>policy relating to the loss of tourist accommodation in light of changes in the tourism market. The SPD is only relevant to existing policy and cannot change this.</p> <p>However, it is accepted that the conferencing sector and associated demand for accommodation is part of the context to the changes in the tourism market, and therefore reference to this will be added into the Background and Context section.</p>
TAR_SPD/17	Marie Nagy (Teal Planning on behalf of Sovereign Harbour Limited)	Background and Context	<p>The role of Sovereign Harbour as a visitor destination, with EBC's ambitions to strengthen this, in particular for business based visitors should also be acknowledged. Sovereign Harbour currently has no formal tourist accommodation. The Draft Tourism Accommodation SPD however includes a photograph of Sovereign Harbour on its front cover, thereby acknowledging the neighbourhood's importance as a visitor</p>	<p>The SPD interprets existing policy relating to the retention of tourist accommodation. This policy only applies to the Tourist Accommodation Area and not to Sovereign Harbour. The design of the front cover of the SPD follows a standard template for all of Eastbourne Borough Council's planning policy documents. The picture of Sovereign Harbour is part of this template and not specific to the Tourist Accommodation</p>

Rep ID	Name	Section	Representation	Officer Response
			<p>attraction.</p> <p>Site 1 at the Harbour was previously set aside for a new hotel, the Sovereign Harbour SPD lists hotel accommodation as an appropriate addition to the Harbour, and outline permission has been granted for possible new accommodation on Sites 4 and 7a. EBC's other emerging policy document, the ELLP, as drafted and promoted by EBC, however actively seeks to limit the provision of such accommodation to the remaining smaller sites within the neighbourhood which will limit the format of visitor accommodation that can be provided and in turn limit operator interest and take-up.</p> <p>If visitor accommodation can progress here (on the smaller sites or ultimately the larger available site, Site 7a), this will support both tourist and business based visitors.</p> <p>The SPD must recognise this planning background, the new offers that may come forward at the Harbour and how it will contribute to the overall range of tourist accommodation for the town's visitors. This may impact on the Draft SPD's proposed primary and secondary tourist accommodation area but it will support the provision a wider choice for visitors,</p>	<p>Retention SPD.</p> <p>The SPD updates the interpretation of existing policy relating to the retention of tourist accommodation; it does not deal with new accommodation. The 'Background & Context' section of the SPD recognises that there is an oversupply of accommodation stock, and a reduction is required to help stimulate investment in better quality accommodation appealing to a broader range of visitors. It is considered that this planning background is sufficient for the purposes of this SPD.</p>

Rep ID	Name	Section	Representation	Officer Response
			strengthening the town's as well as the Harbour's offer overall.	

Appendix 3 – Schedule of Changes to the Draft SPD

Note: Deleted text highlighted by ~~strikethrough~~. New text highlighted in red and underlined.

Ref	Section	Modification
C1	Introduction – Status of Supplementary Planning Document	Amend para 1.6: This draft Tourist Accommodation Retention SPD has been prepared for consultation with the local community and other stakeholders. <u>It was subject to public consultation between 23rd September and 4th November 2016.</u>
C2	Introduction – Status of Supplementary Planning Document	Amend para 1.7: Once adopted, the <u>The</u> Tourist Accommodation Retention SPD will be <u>is</u> a material consideration in the determination of planning applications. It will then supersede <u>has superseded</u> the <i>Assessment of Financial Viability of Tourist Accommodation Supplementary Planning Guidance</i> , which was adopted 2004.
C3	Introduction - Consultation	Delete para 1.9 to para 1.12.
C4	Background and Context – Background	Add new paragraph after para 2.7: <u>In terms of conferencing, Eastbourne hosts an average of between 18 and 20 conferences per annum, attracting an average of between 12,500 and 14,500 delegates per year. However one of the constraints facing the conference market in Eastbourne in terms of attracting more corporate residential conferencing is that the majority of corporates do not book two- or three-star independent hotels, which are prevalent within Eastbourne’s tourist accommodation stock.</u>
C5	Background and Context - Issues	Add new paragraph after para 2.18: <u>A £40m upgrade is being made to the town’s theatre and cultural offer at the Devonshire Park Complex, which will help to attract a new conference market to the</u>

Ref	Section	Modification
		<p><u>town. It is anticipated that rebalancing the tourist accommodation supply will attract investment to deliver the quality of accommodation that would appeal to the conference market, which will complement the Devonshire Park development.</u></p>
C6	Assessment of Viability	<p>Amend para 5.5:</p> <p>It is envisaged that a consultative group could be formed <u>A Tourist Accommodation Consultative Group has been set up</u> to assess the calibre of the application <u>proposals for the loss of tourist accommodation</u> and <u>provide a view on</u> whether or not the criteria have been met. <u>The Tourist Accommodation Consultative Group will consist of Council officers and industry experts, including representation from the Eastbourne Hospitality Associations who will provide a trade perspective on proposals.</u> It will be strongly recommended that any applicant should engage with this group before submission of an application. Any recommendation made by the consultative group will be a material consideration in the determination of the application.</p>
C7	Assessment of Viability	<p>Add new paragraphs after para 5.5:</p> <p><u>It is strongly recommended that any prospective applicant for a proposal involving the loss of tourist accommodation should engage with this group before submission of an application. This can be done by submitting a request for pre-application advice via the Eastbourne Borough Council website (footnote: http://www.eastbourne.gov.uk/businesses/planning-and-building-control/make-planning-application/pre-application-advice/), which will be passed to the Tourist Accommodation Consultative Group for consideration.</u></p> <p><u>There is no obligation for prospective applicants to engage with the Tourist Accommodation Consultative Group; however it is considered that this would be in the interests of the prospective applicant so that they can better understand the way in which an application will be judged against the criteria in the SPD. This will help to ensure that any future application is complete and comprehensive, which will ensure a</u></p>

Ref	Section	Modification
		<u>smoother and quicker passage through the decision making process and avoid early refusal of permission because of inadequate or insufficient information.</u>
C8	Assessment of Viability	Amend para 5.10: It is considered that an appropriate threshold for 'lifestyle businesses' is 15 <u>letting</u> bedrooms. Establishments that are over 15 <u>letting</u> rooms are less likely to be run as 'lifestyle businesses' and would be expected to operate in a more commercial manner. Therefore such businesses would be expected to have business plans and marketing tools that would not necessarily be available to 'lifestyle businesses'. Therefore the council will apply additional flexibility when examining evidence provided by a "lifestyle business.